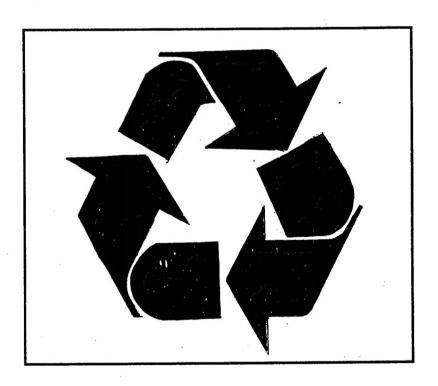
North Hartland Lake, Vermont Connecticut River Basin, Flood Control Project

Solid Waste Management Plan

RECYCLE CONSERVE RESOURCES



September 1996



US Army Corps of Engineers New England Division DTIC QUALITY INTEGRED 2

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There are a number of federal, state, and local laws and regulations relating to solid waste management. This plan provides guidance to establish policies, and responsibilities, procedures, and instructions for proper handling, storage, disposal and recycling of solid waste generated at the flood control project. Solid wastes include petroleum, oil and lubricants (POLs), hazardous waste, paper, beverage containers, woody debris, and various other wastes.

This plan was developed from a literature search and review of federal, state, and local requirements and existing and anticipated waste streams. This plan is not a complete treatise on environmental laws and regulations. It is a list of solid waste regulations, policies, and references that may apply to the flood control project and a codification of existing and enhanced procedures for solid waste management.

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SOLID WASTE MANAGEMENT PLAN

NORTH HARTLAND LAKE, VERMONT, FLOOD CONTROL PROJECT

CONNECTICUT RIVER BASIN
OTTAUQUECHEE RIVER WATERSHED

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September 1996

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GENERAL

1-1 Introduction

This Solid Waste Management Plan includes, hazardous waste, petroleum, oil, and lubricants, and recycling strategies for the North Hartland Lake Flood Control Project located in the towns of Hartland and Hartford, Vermont.

1-2 Purpose

This plan provides guidance to establish policies, responsibilities, procedures, and instructions for proper handling, storage, disposal and recycling of all solid waste generated at the project. Solid wastes include petroleum, oil and lubricants (POLs), hazardous waste, paper, beverage containers, woody debris, and miscellaneous wastes.

The plan was developed from a literature search and review of federal, state, and local requirements and existing and anticipated waste streams. This plan is not a complete treatise on environmental laws and regulations. It is a list of solid waste regulations, policies, and references that may apply to the flood control project and a collection of codifications pertaining to existing and enhanced procedures for solid waste management.

1-3 Flood Control Project Description

The North Hartland Lake flood control project is located in east-central Vermont on the Ottauquechee River in the towns of Hartland and Hartford in Windsor County, Vermont. (See Figure 1.) The project built and operated by the Corps of Engineers is used for flood control, natural resource management, and recreation. North Hartland Lake is one of 16 flood control projects constructed by the Corps in the Connecticut River Basin. The project provides protection for downstream communities as well as allow for reduction of the Connecticut River flood stages in Massachusetts and Connecticut.

There are two non-federal hydropower facilities located at the project: the North Hartland Hydropower Project and the Dewy Mills Hydroelectric Power Generation Station.

The North Hartland Hydropower Project is a 4,000 kW hydropower facility located about 500 feet downstream of the dam. This project is owned and operated by Vermont Electric Cooperative, Inc.¹ The recreational pool head at North Hartland Lake is used for power generation. The dam outlet conduit has been modified to allow discharge to the powerhouse. A set of override controls is installed at the dam to allow the project manager to disrupt generating activity and to operate the reservoir for flood control only, if necessary.

The Dewey Mills Hydroelectric Power Generation Station is located upstream of the Corps dam, above Quechee Gorge, at Dewey Mills dam. The operational mode is run of river and the installed capacity is 1,840 kW. This project is operated by Hydro Energies Corporation.

The Corps project consists of a rolled earth filled dam and dike, side channel spillway, outlet works, and facilities for recreational purposes. The dam is 1,640 feet long and has a maximum height of 185 feet. The top width of the dam is 24 feet. An L-shaped spillway built in rock is located at the north end of the dam abutment. The crest length is 465 feet and the crest elevation is 546.5 feet NGVD. The dam has the capacity to store 71,00 acre-feet of water during flood control operations.

The dam outlet works consist of a 743 foot long tunnel under the dam (concrete horse-shoe conduit 12 feet in diameter), control gates, control tower and operating house on the upstream side of the dam. There is a log boom located upstream of the dam to catch any woody and other debris which might foul the outlet works.

The dike is rolled earth and rockfill with a maximum height of 52 feet and 2,110 feet in length. The dike is located about one half mile south of the dam and is used for closure of a low area in the reservoir area. The dike also contains a 36-inch wide tunnel (a 476 footlong gated concrete circular conduit under the dike).

This pool provides for recreation and natural resource purposes and provides adequate

¹ According the Corps project manager, Vermont Electric Generating is currently out of business due to financial difficulties. (Personnel Communication, Mark Rosenthal, June 13, 1996.)

VEC HYDRÖPOWER

INSTALLATION

DIKE

TO WASS

TO WINDSOR

NORTH HARTLAND LAKE RESERVOIR MAP 30 SEPTEMBER 1984 OTTAUQUECHEE RIVER VERMONT SCALE IN FEET 0 800 1600 2400 NEW ENGLAND DIVISION WALTHAM, MASS. PICTION 1

head and discharge for hydropower generation.

At present, the recreational area on project lands consist of a picnic area, camping area, (currently leased to the State of Vermont), boat ramp, and comfort station. North Hartland Lake provides a variety of recreation opportunities. Water-based activities include boating (power and non-power boats), fishing, and swimming. Land-based activities include picnicking, ball playing, cross-country skiing, hiking, mountain bike riding, snow mobiling, hunting, and trapping.

1-4 Overview of Solid Waste Generation²

Facilities at the project that are potential waste generators or waste storage areas include the project office, several storage buildings, vehicles, control building (gate house) at the dam, log boom, recreation areas (swimming beach/picnic area and boat launch) and project lands where there can be illegal dumping of trash.

In general, solid waste generated at the project is carried out under the provisions of maintenance and disposal contract with a local hauler. There are no active on-site landfills. The burial of solid waste is not permitted. Some yard waste and woody debris from the log boom is burned on site³. Non-hazardous recyclable materials are brought to the local recycling center by project staff. A carry in/carry out policy has been implemented at the recreation areas. Consumptive maintenance activities, such as service of project vehicles, are usually conducted off-site by a licensed service station or on-site by a contractor. Minimal hazardous wastes are generated at the project.

² This plan does not cover areas that are leased or licensed to other entities.

³ When burning at the site, the project manager must comply with state regulations for air pollution, notify the local fire warden, the local fire dispatcher, and the local airport.

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LAWS, REGULATIONS, and DIRECTIVES

2-1 Federal

The following is a list of pertinent Federal Statutes and Regulations, Executive Orders, Department of Defense Directives, Department of the Army Regulations and Corps of Engineer Regulations. This list should be updated periodically as laws and regulations are modified and reviewed by legal counsel, as appropriate, to determine the completeness and applicability of the list.

Statutes

Resource Conservation and Recovery Act (RCRA) of 1976, PL 94-580, as amended Subtitle C - Hazardous Waste Management
Subtitle D - State or Regional Solid Waste Management Plans

Toxic Substance Control Act (TSCA) of 1976, Public Law 94-469, as amended.

Federal Facilities Compliance Act (FFCA) of 1992, P.L. 102-386.

Code of Federal Regulations

U.S. Department of Transportation (DOT) Hazardous Materials Regulations including Registration of Persons Who offer for Transport Hazardous Materials (Title 49 CFR, Part 107) Hazardous Materials Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements (Title 49 CFR, Part 172, 173) Segregation and Separation Chart of Hazardous Materials (Title 49 CFR, Part 177), and Packaging Standards (Title 49 CFR, Part 178).

U.S. Environmental Protection Agency (EPA) Protection of the Environment, Hazardous Waste Management Regulations (Title 40 CFR, 260-266).

U.S. Environmental Protection Agency (EPA) Protection of the Environment, Solid Waste Management Regulations (Title 40 CFR, 240-258).

Department of Defense Directives

DoD 4160.21-M, Defense Utilization and Disposal Manual, September 1982, as amended.

DoD Directive Number 4165.60, Solid Waste Management, dated 4 Oct 74.

Department of the Army Regulations

AR 200-1, Environmental Protection and Enhancement, 23 April 1990, Chapter 5 (Hazardous Material Management Program) and Chapter 6 (Solid Waste and Hazardous Waste Management Program).⁴

AR 420-47, Solid and Hazardous Waste Management, 1 December 1984.

Executive Orders

Executive Order 12088, Federal Compliance with Pollution Standards

Executive Order 12780, Federal Agency Recycling and the Council of Federal Recycling and Procurement Policy, Nov 4,1991.

Executive Order 12873, Federal Acquisition, Recycling, and Waste Prevention, Oct 22, 1993.

Executive Order 12843, Procurement Requirements and Policies for Federal Agencies for Ozone Depleting Substances, April 21, 1993.

Executive Order 12856, Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements, August 3, 1993.

⁴ Army Regulation 200-1. Applicability. This regulation does not apply to those civil works activities under the jurisdiction of the Secretary of the Army and implemented by the U. S. Army Corps of Engineers. However, it is anticipated that in the future a Corps Engineering Regulation similar to this regulation will be published.

Executive Order 12902, Energy Efficiency and Water Conservation at Federal Facilities, March 8, 1994.

Memoranda

Memorandum, CECC-ZA, dated 30 October 1992, Subject: Federal Facilities Compliance Act (FFCA).

Memorandum, CECW-OA, dated 24 Nov 1992, Subject: USACE Facilities Environmental Compliance Letter No. 1, Solid Waste Recycling.

Memorandum, CECW-OA, dated 25 August 1993, Subject: Hazardous Waste Manifest Policy and Procedures.

Memorandum, CEMP-CP, dated 4 May 1995, Subject: Hazardous Waste Manifest Signature Policy and Procedures.

Memorandum, CECW-OA, dated 22 February 1995, USACE Facilities Environmental Compliance Guidance Letter No. 2, Federal Facilities Compliance Act (FFCA) of 1992, Fines and Penalties at Civil Works Funded Projects, Facilities and Activities.

Reports

USACERL Special Report - EC 95/05, dated Nov 94, titled "Environmental Assessment and Management Team Guide" (ERGO)

USACERL Special Report - EC 95/07, dated Nov 94, titled "Environmental Review Guide for Operations" (ERGO), "Supplement for the Environmental Assessment and Management Team Guide".

2-2 State of Vermont

The Federal government sets minimum national standards for solid waste disposal The State of Vermont may impose more stringent measures and procedures than the federal regulations. The following is a list of pertinent state of Vermont Statues, Regulations, and Reports.

General Laws

Vermont Statutes, Title 10, Conservation and Development, Chapter 159, Waste Management

Vermont Regulations

Vermont Hazardous Waste Management Regulations (VHWMR), Subchapter 1 through Subchapter 9.

2-3 Local

In Vermont, the local towns or waste management districts are responsible for implementing local ordinances to regulate the separation, recovery, collection, removal, storage and disposition of recyclables. Both the town of Hartland and Hartford, Vermont, have solid waste management ordinances. These are included in Appendix A. These ordinances are similar and requires business, institution, and industries located within the towns to separate recyclables from all other solid waste. These recyclables should then be recycled in an appropriate manner as specified in the ordinances.

2-4 Applicability

Federal Facilities Compliance Act of 1992. (P.L.- 102-386) This act provides for a waiver of sovereign immunity with respect to federal, state, and local procedural and substantive requirements relating to RCRA solid and hazardous waste laws and regulations. Additionally in its passage of the Act, Congress clearly intended to subject Federal facilities to penalties and fines arising from violation of these laws.

Federal Recycling Requirements. (40 CFR 246.200-1 and 246.202-1, DoD 4165.60, Executive Order 12873, CECW-OA-memorandum-24-November-92.) According to direction provided in these regulations, Corps facilities are required to participate in any state or local recycling program and reduce the volume of waste materials at the source whenever practical. Facilities with over 100 office workers are required to recover high grade paper. Agencies are also required to set goals for increasing the procurement of recycled and environmentally preferable products.

<u>Vermont Regulations</u>. RCRA, like most federal environmental legislation, encourages states to develop and run their own solid waste program. The state program must be as least as stringent as the EPA program. Vermont has been authorized by EPA to run their own solid waste program.

The state solid waste management laws are contained in Vermont Statutes, Title 10, Conservation and Development, Chapter 159, Waste Management. In general, Section 6621 of Chapter 159 prohibits disposal of lead acid batteries, waste oil, white metal goods, tires, paint, or nickel cadmium batteries in solid waste landfills. Also according to Section 6621b, a person may not place into a mixed municipal solid waste a dry cell battery containing mercuric oxide electrode, silver oxide electrode, nickel-cadmium, or sealed lead acid that was purchased for use by a government agency, or an industrial, communications, or medical facility.

The Vermont Hazardous Waste Regulations are contained in Vermont Hazardous Waste Management Regulations (VHWMR), Subchapter 1 through Subchapter 9. Generators of hazardous waste are required to comply with VHWMR and are subject to unannounced inspections by state inspectors.

2-5 Suggested Policy Guidelines

Suggested policy guidelines for management of solid wastes including POLs, waste liquid and hazardous waste are as follows:

- a. The quantity of solid waste should be reduced at the source whenever possible.
- b. Appropriate components of the waste stream should be recycled or composted to the fullest extent possible.
- c. Non-hazardous and non-toxic materials should be substituted for hazardous and toxic materials used in facility and activity operations and procedures, when practicable.
- d. Waste should be handled, stored, and disposed of in a manner which protects the health and welfare of all persons.
- e. Storage and disposal of POLs should be carried out by the method(s) most advantageous to the government, in compliance with Federal, state, local, DoD and Army requirements.
- f. Hazardous waste should be safely controlled, accounted for with an audit trail and chain of custody, and handled in accordance with legal requirements.
- g. This project should not establish or maintain a landfill.
- h. To the extent possible, environmentally friendly products and products made from recycled materials should be purchased for use at the project.

WASTE DEFINITIONS 5

3-1 Solid Waste

Solid waste includes garbage, refuse, and sludge as well as any solid, semi-solid, liquid, or contained gaseous material that is discarded. A discarded material is one that has been determined to be an inherently waste-like material by the EPA Administrator. Under certain circumstances, recycled materials are considered discarded materials (and therefore solid wastes) if they are used in a manner constituting disposal, burned for energy recovery, reclaimed, or accumulated speculatively. Certain wastes have been excluded for the definition of solid waste: domestic sewage; point-source discharges regulated under the Clean Water Act (CWA); irrigation return flows; source, special nuclear, or by-product material regulated under the Atomic Energy Act; *in situ* mining waste; pulping liquors that are reclaimed; spent sulfuric acid used to produce virgin sulfuric acid; and secondary materials reclaimed and returned to the original generation process for reuse. The regulatory definition of solid waste may be found in 40 CFR 261.2.

3-2 Hazardous Waste

The Resource Conservation and Recovery Act (RCRA) was passed by Congress in 1976 to address the problem of how to safely manage and dispose of municipal and industrial waste generated nationwide. RCRA creates a framework for the proper management of hazardous and non-hazardous waste. Federal regulations only set a baseline standard with which everyone involved with hazardous wastes must comply. Frequently states choose to adopt more stringent regulations than federal regulations.

RCRA addresses the "cradle to grave" management of hazardous waste. This includes the generation, storage, treatment, transportation and disposal of hazardous wastes. RCRA defines hazardous waste as a solid waste (including liquids and gases), or a combination of

⁵ Some of the wording in this section was adapted from a publication prepared by ENSR Consulting and Engineering, Acton, Massachusetts, entitled "A guide to Permitting, Compliance, Closure, and Corrective Action Under the Resource and Conservation Recovery Act", dated October 1990.

solid wastes which may, because of its quantity, concentration, or physical, chemical or infectious characteristics:

- o cause or significantly contribute to an increase in mortality or in serious irreversible, or incapacitating illness; or
- o pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Certain types of solid waste are excluded from regulation as hazardous waste. These include:

- o household waste;
- o solid wastes generated by growing crops or raising animals, and which are returned to the soil as fertilizers;
- o mining overburden returned to the mine site;
- o ash waste produced from the combustion of fossil fuels;
- o wastes from oil, gas, and geothermal exploration, development, or production;
- o certain wastes failing the toxicity characteristic test including discarded wood or wood products, and petroleum-contaminated media or debris;
- o specific wastes from the extraction, beneficiation, and processing of ores and minerals; and
- o cement kiln dust waste.

See 40 CFR 261.4 for the complete listing of exclusions.

<u>Listed versus Characteristic Hazardous Wastes</u>. Under the current federal regulatory framework, a solid waste is considered a hazardous waste (and therefore subject to requirements of RCRA) if it is either a "listed" waste under 40 CFR Part 261 Subpart D, or a "characteristic" waste under 40 CFR part 261 Subpart C.

A waste is a listed waste if it comes from a process that was found to generate a "hazardous" waste (non-specific source wastes and specific source wastes), or if the waste is a commercial chemical product that has been discarded. Non-specific source wastes are generic wastes commonly produced by manufacturing and industrial processes and specific source wastes consist of wastes from identified industries such as wood preserving, petroleum refining, and organic chemical manufacturing. Commercial chemical products include such items as acetone, creosote, dichlorodiphenyltrichlorethane (DDT) methanol, and toluene. (Refer to 40 CFR Subpart D, Section 261.30-261.33 for listed wastes.)

A characteristic waste exhibits any one or more of the following characteristics: ignitability, corrosivity, reactivity, or toxicity. The definitions of these characteristics is included in 40 CFR 261.20-261.24.

Special Wastes. Non-hazardous solid waste requires handling other than normally used (see 40 CFR 240.101). Special wastes are waste streams that do not come under RCRA, but may come under state hazardous waste requirements or under the Toxic Substance Control Act. States may choose to include items in their state hazardous waste regulations which are not considered hazardous wastes under RCRA.

State Identification and Listing of Hazardous Wastes. The Vermont Hazardous Waste Regulations provides an identification and listing of Hazardous Wastes in Vermont. (See Subchapter 2: Identification and Listing of Hazardous Waste.) Although these are similar to the RCRA requirements, Vermont has included additional listings not found in RCRA.

3-3 Non-Hazardous Waste

For purposes of this plan, non-hazardous wastes are those that are not considered hazardous under federal or state regulation. This would include such items as paper, cardboard, beverage containers, scrap metal (free of any residues) and woody debris.

3-4 Classification of Hazardous Waste Generators

LQG criteria can be found in 40 CFR 262.

Federal Definitions. The first step in the waste cycle is the generator. Under RCRA regulations, generators must determine if their waste is hazardous and must oversee the management and ultimate fate of the waste. RCRA identifies three different categories of hazardous waste generators. The generator definition is important because applicable waste management regulations vary for each type of generator. These categories are conditionally exempt small quantity generator (CESQG), small quantity generator (SQG), large quantity generator (LQG). For general information, a summary of key RCRA criteria for CESQGs [40 CFR 261.5] and SQGs [40 CFR 262] are:

	Hazardous Waste Generation amount/month	Accumulation of Hazardous Waste maximum amount
CESQG	max. 100 kg (220 lbs)(~26 gal.)	1,000 kg (2,200 lbs)(~260 gal.)
SQG	max. 1,000 kg (2,200lbs)(~260 gal.)	6,000 kg (13,200 lbs)(~1,560 gal.)
	Acute Hazardous Waste Generation amount/month	Acute Hazardous Waste Generation maximum amount
CESQG	max. 1 kg (2.2 lbs)(1 quart)	max. 1 kg (2.2 lbs)(1 quart)
SQG	max. 1 kg (2.2 lbs)(1 quart)	max. 1 kg (2.2 lbs)(1 quart)
	Material from Cleanup of a Spill of Acute Hazardous Wastes amount/month	Material from Cleanup of a Spill of Acute Hazardous Wastes maximum amount
CESQG	max. 100kg. (220 lbs)(~26 gal)	max. 100kg. (220 lbs)(~26 gal)
SQG	max. 100kg. (220 lbs)(~26 gal)	max. 100kg. (220 lbs)(~26 gal)
	1 0 11 10 CTD 0/0	

State Definitions. State of Vermont Hazardous Waste Management Regulations define two types of generators, a Conditionally Exempt Small Quantity Generator (CESQG) and a "Generator". The definition for a Vermont CESQG is similar to the RCRA definition described above. All other hazardous waste generators are considered "Generators". For general information, a summary of key state criteria for CESQGs [VHWMR 7-303] are:

Hazardous Waste Generation		Accumulation of Hazardous Waste
	amount/month	accumulate less than the
		following at any time
CESQG	less than 100 kg (220 lbs)	1,000 kg (2,200 lbs)
Acute	Hazardous Waste Generation amount/month	Acute Hazardous Waste Generation accumulate less than the
CESQG	less than 1 kg (2.2 lbs)	following at any time 1 kg (2.2 lbs)
025Q0	1035 tildir 1 kg (2.2 103)	1 Kg (2.2 105)
Mater	ial from Cleanup of a Spill of	Material from Cleanup of a Spill of
	Acute Hazardous Wastes	Acute Hazardous Wastes
	amount/month	accumulate less than the
		following at any time
CESQG	less than 100kg. (220 lbs)	100kg. (220 lbs)

If any person generates or accumulates hazardous waste in amounts exceeding the limits specified above, then that person is considered a "Generator" and is subject to full regulation under the State's hazardous waste regulations. [VHWMR 7-303 (5)]

EPA Identification Number. Each project has been assigned an EPA federal facility identification number for reporting purposes. (See Appendix B.) These numbers were assigned to the projects in 1981. At that time the projects were identified as SQGs (federal generator definition). These numbers were issued by EPA to the Corps prior to the federal Facilities Compliance Act, which was promulgated in 1992. Since the Federal facilities Compliance Act, the federal projects in New Hampshire are also required to meet the Vermont requirements relating to hazardous waste laws and regulations.

Generator Category. Each project should be tracking and documenting on an annual basis the amount of hazardous waste generated per month at the facility. This data can be used to determine what type of generator you are. If your generator category changes or if other information regarding your facility requires updating, you should notify EPA and the state of these changes. Any actions to modify your generator status or facility information should be approved through NED channels.

Rules on Storing and Disposal of Hazardous Wastes. The project manager should ensure that he is in compliance with both state and federal requirements for hazardous waste generators. In general, these requirements include properly storing and labeling hazardous waste, not exceeding accumulation time criteria, and using the manifest system to ensure that waste is sent by a licensed hauler to an EPA and State approved disposal facility, meeting record keeping and reporting regulations, and providing training to staff.

A comparison of RCRA generator requirements are included in the Environmental Assessment and Management (Team) Guide EC-95/05, page 4-3 and are detailed in the Code of Federal Regulations Title 40, Parts 260-266. Vermont generator requirements are detailed in the Vermont Hazardous Waste Management Regulations. Also for informational purposes, the "Hazardous Waste Generator Handbook" prepared by the Vermont Department of Environmental Conservation, Hazardous Materials Management Division, dated May 1994, is included as Appendix C.

For informational purposes the RCRA and State generator requirements are summarized on the following pages. For specific information regarding the generator requirements the project manager should refer to the federal and state regulations.

Comparison of RCRA - CESQG and SQG Generator Requirements (Source: EC/95/05)⁶

Requirement	CESOG	SOG
Identify Hazardous Waste	yes	yes
Facility Receiving Waste	State approved or RCRA permitted	RCRA permitted
EPA ID Number	Not Required	Required
RCRA personnel Training	Not Required	Required
DOT Training	Required	Required
Exception Report	Not Required	Required > 60 days
Biennial Report	Not Required	Not Required
Accumulation Time Limits	None	180 days
Use Manifests	No ⁷	Yes
Storage Requirements	None	Comply with regulations

⁶ For LQG requirements see EC/95/05 or CFR Title 40, Parts 260-266.

⁷ It is NED policy that all hazardous waste be manifested regardless of the generator status.

Comparison of State of Vermont - CESQG and "Generator" Requirements (Source: Summary prepared from Vermont Hazardous Waste Management Regulations. For full listing of generator requirements see VHWMR, Sections 7-301 to 7-310)

Requirement	CESQG	"Generator"
Identify Hazardous Waste	yes	yes
EPA ID Number	Required	Required
Facility Receiving Waste	State authorized and RCRA approved	RCRA permitted
Notification of Hazardous Waste Activity Form to Vermont Agency		
of Natural Resources	yes	yes
Personnel Training	Not Required	Required
DOT Training	Required	Required
Annual Report	Maybe Required	Required
Accumulation Time Limits	Not Required	90 days (See Section 7-308 for details and extensions.)
Inventory and Inspection	Not Required	Daily log
Emergency Equipment	Not Required	Required
Contingency Plan	Not Required	Required
Use Manifests	No 8	Yes
Follow regulations for containers, tanks, and storage areas	Some Requirements	Required

 $^{^{\}rm 8}\,$ It is NED policy that all hazardous waste be manifested regardless of generator status.

MANAGEMENT OF WASTE STREAMS

4-1 General Solid Waste Management Options

The following is a list of possible solid waste management options.

- a. Purchase and use recycled products.9
- b. Reduce the amount of waste generated. 10
- c. Sort, recycle, and compost appropriate components of the waste stream.
- d. Combust, with energy recovery, the balance of waste that cannot be reduced or recycled.¹¹
- e. Landfill wastes that cannot be reasonably be recycled or combusted.

Off-site solid waste management which may be available include recycling and composting facilities, waste processors, solid waste combustion facilities and landfills. The variety of available disposal options should be fully considered in the management of project wastes.

⁹ Executive Order 12873 requires Federal agencies to procure products that are environmentally preferable or made with recycled materials. Corps guidance regarding this executive order has not yet been developed.

The project Pollution Prevention Plan provides target waste reduction goals.

This management option is not available on-site at the project.

4-2 Solid Waste Generators

There are several different potential waste generation locations at North Hartland Lake. The following is a list of these sites. General management of these materials is discussed in Chapters 4 and 5.

<u>Project Office</u>. Generates high grade office paper, other recyclable paper (e. g. newspaper), containers (plastic, glass, aluminum), fluorescent lights and light ballasts, household batteries, cardboard and miscellaneous refuse.

<u>Paint Locker in the Project Office</u>. The specialized storage room stores the paint, oil, automobile batteries and hazardous materials.

<u>Petroleum Product Storage Tanks.</u> The location of these tanks are described in the North Hartland Lake Spill Prevention, Control, and Counter Measure and Contingency Plan, dated August 1995.

Storage Buildings. Stores rock salt, signs, small hand equipment, heavy equipment such as tractors and boats, etc....

<u>Control Building at Dam (Gatehouse)</u>. Uses fuel oil for the heating unit and hydraulic fluid for the flood control gates.

<u>Log Boom</u>. Captures woody and other debris from flooding events (for example: tires, 50-gal. drums, other miscellaneous refuse).

<u>Picnic Areas/Swimming Beaches/Boat Launch</u>. In order to minimize waste generation at the recreation areas, a carry in/carry out policy has been implemented. At the entrance to the recreation areas visitors are informed of this policy and provided with a garbage bag in which to collect their refuse and carry it away when they leave.

<u>Public Rest Rooms</u>. Public rest rooms are located at the Project Office and at the recreation area. Paper hand towels are provided and disposed of in trash cans in the rest rooms.

Rain Gage. A biodegradable antifreeze is used in the rain gage.

<u>Project lands</u>. Generates trash illegally dumped at project by the public - old tires, yard waste, aluminum cans etc. (Corps access roads are gated and closed during non-recreation times and help to prevent illegal dumping of trash on project lands. However, access may occur through land abutting Corps property that is not fenced or gated.)

Renovation/Construction at Project. May generate asphalt and building construction debris.

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MANAGEMENT OF HAZARDOUS WASTE

5-1 General Requirements

The following is a general outline of hazardous waste management requirements. The project manager should refer to the Vermont Hazardous Waste Management Regulations (VHWMR) for detailed information. Where the hazardous waste generating activity is carried out by a Corps contractor, the contractor will be required to follow all applicable state, local and federal regulations.

A separate collection, packaging and storage system should be established, so that all wastes are properly segregated, identified and labeled to facilitate disposal through a licensed contractor.

The use of materials which generate hazardous waste should be minimized. Hazardous materials should be purchased in minimal quantities for completion of the task at hand.

The hazardous waste should be stored in a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored in the container. Containers must be Department of Transportation approved for highway transportation.

The hazardous waste storage area must meet the requirement of state and federal hazardous waste regulations. In general the area must be identified by the appropriate signs. The storage area floor must be impermeable, safety and emergency equipment must be available, and there must be adequate aisle space.

Throughout the period of storage or treatment, each container shall be clearly marked and labelled in a manner which identifies the date accumulation began, the hazardous waste(s) being stored or treated in the container, and the hazard(s) associated with the hazardous waste (e.g., ignitable, toxic, dangerous when wet). Each container shall also be marked clearly with the words "Hazardous Waste". Vermont hazardous waste storage requirements are

detailed in VHWMR Subchapter 3. The period of storage should not exceed that allowed by Vermont regulation.

The generating activity is responsible for preparation of containers and documentation for disposal and should comply with Department of Transportation Regulations for transport of hazardous materials. Containers must be accompanied by proper documentation and any other information required by the contractor, such as Material Safety Data Sheets (MSDSs), laboratory analysis results, or waste profile data.

Hazardous waste should be disposed of through a licensed hauler and sent to a licensed facility. A hazardous waste manifest will accompany any materials and appropriate record keeping will be utilized. Only those persons formally designated and authorized by the Division Commander are authorized to execute hazardous waste manifests and related documents. The formal designation and authorization must be in writing and state the employee is within their scope of employment when executing such documents. Records of the authorization should be kept on file. DOT manifest training must be current. Expiration of training (2 years) will void formal designation authority. (See Appendix D)

It is suggested that all records regarding Hazardous Wastes be maintained at the project office for a minimum of 3 years. (The 3 year time frame is specified in the VHWMR, Section 7-804, Record Keeping.)

Daily inspection during regular business days of the storage area must be conducted to ensure the containers are in good condition. Inspections are to be documented in a log book. (See VHWMR, 7-309 (1), Inventory and Inspection.) An inventory of hazardous waste in the storage area must be kept at a location apart from the storage area. This is necessary so that in the event of an emergency a record of stored hazardous waste is available.

Specific Petroleum, Oil, and Lubricant requirements are included in the Spill Prevention, Control and Countermeasures Plan (SPCCP), and Spill Contingency Plan for North Hartland Lake dated, August 1995.

¹² At the North Hartland Lake project Ms. Roxanne Barbeau is designated to sign hazardous waste manifests.

Infectious wastes (medical) are regulated as a Hazardous waste under Vermont Regulations. (See VHWMR, 7-210, Vermont Listed Wastes.) No medical wastes are generated at the project site. However, if such wastes are illegally dumped at the project site, they should not be disposed of by project staff. The area where the waste is located should be secured and posted as to the hazard. The Local Board of Health and the Vermont Emergency Management Hotline (800) 424-8802 should be immediately notified to determine the appropriate course of action. The Division Safety Officer should also be notified regarding any medical wastes found on project lands.

5-2 Specific Suggestions for Disposal of Hazardous Waste.

Waste Oil. Under RCRA, if used oil is considered a hazardous waste, it is subject to all hazardous waste regulations. Criteria to consider when determining if your waste oil is a hazardous waste are: has it been mixed with a listed hazardous waste or characteristic hazardous waste; does it contain more than 1000 ppm total halogens; or does it have a hazardous waste characteristic. If it is not considered a hazardous waste then it must be managed in accordance with federal regulations for standards for management of waste oil. These are included in 40 CFR part 279.

In Vermont, waste oil is not regulated as a hazardous waste provided that (VHWMR 7-203(14):

- (1a) it does not exhibit a hazardous waste characteristic;
- (1b) it is stored in such a way that no leakage occurs and;
- (1c) it is offered to a certified hazardous waste hauler for transport to a facility, marketer or collector where the waste oil is burned for energy recovery.
- (2) If the waste oils exhibit one or more hazardous waste characteristics and is recycled in some other way than burning for energy recovery.

<u>Used Oil Filters</u>. Under the federal hazardous waste regulations, used oil filters may be considered a hazardous waste. There is an exemption from hazardous waste requirements

if all the oil is removed from the filter and if the filter is not lead plated.

Vermont also exempts used oil filters from hazardous waste requirements if the filter does not exhibit a characteristic of a hazardous waste and the filters are drained for at least 4 hours, or crushed and drained, and all drained oils are collected and managed subject to the used oil regulations.

In general all flood control project automobiles and heavy equipment are maintained off-site by service station or on-site by a contractor. However, if there are any used oil filters generated at the project, they should be handled in manner consistent with federal and state regulations.

<u>Cleaning Solvent</u>. Project staff reported that an organic based non-hazardous cleaning solvent is used at the site. Be aware that many degreasing solvents when disposed of are hazardous wastes.

<u>Lead Acid Batteries</u>. Vermont requires that lead-acid batteries be recycled where possible. Requirements for reclaimed lead-acid batteries are outlined in VHWMR 7-612.

- (1) Any generator, dealer, or collector who stores spent lead-acid batteries shall store the batteries under cover on an impervious surface;
- (2) Transport of spent acid batteries shall be in compliance with 49 CFR parts 171 through 177;
- (3) Owners or operators of facilities which store lead-acid batteries before reclaiming them are subject to requirements of 40 CFR Part 266, Subpart G.

When not possible to recycle, for example if batteries are damaged or not in condition for acceptance by the recycler, they are to be disposed of as hazardous waste. Disposal in landfills is prohibited.

Other Batteries. Eight metals are commonly used in batteries: mercury, cadmium, lead, zinc, manganese, nickel, silver, and lithium. Batteries should not be disposed of as miscellaneous refuse.

In Vermont rechargeable batteries can be brought back to the manufacturer for regeneration. Some non-rechargeable batteries (sometimes referred to as household batteries) may be sent to a recycling facility. When sent to be recycled the procedures to follow for storage and shipping are outlined in the EPA Standards for Universal Waste Management [40 CFR 273]. Spent batteries that can not be recycled should be handled as hazardous waste. Be aware that some of the newly manufactured batteries may be below toxicity levels for hazardous wastes.

Antifreeze. A determination should be made as to whether or not any waste antifreeze generated at the project is considered a hazardous waste. If it is, the storage and disposal must comply with all state and federal hazardous waste regulations. In general, all vehicle maintenance is done off-site by a service garage or on-site by a contractor.

<u>Surplus Paint and Allied Products</u>. These may include oil-based paint, paint thinners, turpentine, varnishes, shellacs or polyurethane. Purchase of these products should be on an as needed basis. Any residues should be stored and disposed of in accordance with state and federal hazardous waste regulations.

<u>Pesticides/Herbicides</u>. Careful selection, inventory and control of materials will help to reduce or eliminate their disposal. Any residues should be stored and disposed of in accordance with state and federal hazardous waste regulations. At the project all of the herbicide activities are carried out by a contractor. All contractors are required to be state licensed and to comply with applicable state and federal regulations. Project staff reported that no pesticides are used at the project.

Treated Wood. Some wood is chemically treated to enhance its resistance to rot and insect damage. Treatment extends use from 3-5 years to 20-50 years or longer. The four most common mediums to treat wood are creosote, inorganic arsenical, pentachlorophenol (PC), and Copper Napthenate. Treated wood is not a "listed" hazardous waste under Federal Regulations. However, it is subject to the Toxicity Characteristics Leaching Procedure (TCLP) to determine if the wood is a "characteristic" hazardous waste (40 CFR 261.24).

If the treated wood is determined to be a hazardous waste it should be stored and disposed of in accordance with state and federal regulations.

<u>Fluorescent Lights and Ballasts</u>. These items are known to contain hazardous materials. They should not be disposed of as miscellaneous refuse. Light ballasts may contain polychlorinated biphenyls (PCBs) and fluorescent lamps contain varying levels of mercury.

Regarding ballasts, Vermont's "listed" hazardous waste includes waste containing PCB in concentrations equal or greater than 50 ppm. Federally these same PCB wastes are regulated under the TSCA regulations. You must determine if the ballasts contain PCB and if so comply with both sets of regulations.

Regarding spent fluorescent lamps, those which exceed the limits established by the TCLP test are considered to be hazardous waste and subject to Vermont Hazardous Waste Rules. If the lamps are not broken, they can be sent to a recycling facility.

<u>Empty Containers</u>. The federal regulations regarding residues of Hazardous Wastes is based on the definition of "empty". If the container is "empty", then the container is not subject to the hazardous waste regulations. However, a container is only considered empty if it meets the criteria in 40 CFR 661.7. This criteria is summarized below. The Vermont definition of "empty container" is very similar to the federal definition and is included in VHWMR Section 7-203(10).

- (1-i) All waste has been removed that can be using the practices commonly employed to remove materials from that type of container,
- (1-ii) and no more than 2.5 centimeters of residue remain at the bottom of the container,
- (1-iii) or no more than 3 percent by weight of the total capacity of the container remains in the container if the container is less than 110 gallons in size and no more than 0.3 percent by weight of the total capacity if the container is greater than 110 gallons in size.
- (2) A compressed gas container that held a hazardous waste is empty when the pressure in the container approaches atmospheric.
- (3) If the container has held an acute hazardous waste then the container must be cleaned by triple rinsing, using a solvent capable of removing the product; or the container must be cleaned by another method that has been shown in the scientific literature to achieve equivalent removal.

MANAGEMENT OF NON-HAZARDOUS WASTE

6-1 General Requirements

Recreational Waste Collection. Covered waste containers are not provided at public use areas. It is the responsibility of the visitor to the project to remove any waste they generate from the site and dispose of it properly. A Carry In/Carry Out policy has been implemented at the recreation area. Visitors are provided with a garbage bag when they enter the park.

Miscellaneous Waste Collection. There is one dumpster located at the project, a 3-yard dumpster near the project office. The dumpster is emptied on a monthly/bi-monthly basis by a licensed disposal contractor. The dumpster should not be used for recyclable materials.

6-2 Recyclable Waste

Beverage Containers (glass and plastic bottles, aluminum cans). These items should be recycled. (See the "Markets and Special Services Directory for Reusable and Recyclable Materials, dated February 1996, included in Appendix E.)

High Grade Office Paper/Newspapers/Cardboard/Mixed Paper. High grade office paper is recyclable and should be collected in separate containers for recycling. Cardboard and newspaper may also be recycled. (See the "Markets and Special Services Directory for Reusable and Recyclable Materials, dated February 1996, included in Appendix E.)

<u>Scrap Metal</u>. Scrap metal should also be recycled. (See the "Markets and Special Services Directory for Reusable and Recyclable Materials, dated February 1996, included in Appendix E.)

<u>Laser Toner Cartridges and Printer Ribbons</u>. These items can be recycled. (See the "Markets and Special Services Directory for Reusable and Recyclable Materials, dated February 1996, included in Appendix E.)

6-3 Compostable Waste

<u>Leaves/woody debris (yard waste)/woody log boom debris</u>. There in no composting available at the project. Woody, log-boom debris is burned on-site. The project manager is responsible for obtaining the appropriate approvals and permits. Woody debris not burned should be removed by a licensed disposal contractor from the project.

6-4 Non-recyclable Wastes

<u>Miscellaneous Refuse and Non-Recyclable Paper</u>. This waste should be picked up by a licensed disposal contractor from the project.

6-5 Difficult to Manage Wastes

Construction and Demolition(C&D). This waste is debris generated from construction, renovation, repair, and demolition of roads, bridges, and buildings. It includes wood, steel, concrete, masonry, plaster, metal, and asphalt. At the project, the disposal of this material will be the responsibility of the construction contractor for any renovation project. The material should be disposed of at an approved C&D disposal facility.

<u>Tires</u>. Vermont has banned the landfill disposal of tires. Most tire distributors, transfer stations, and garages will accept tires for a fee. (Also see the "Markets and Special Services Directory for Reusable and Recyclable Materials, dated February 1996, included in Appendix E.)

White Metal Goods. White metal goods are household appliances which include refrigerator, water heaters, electric ranges etc.... Vermont has banned white goods from landfill disposal. Most transfer stations and junk yards recycle appliances for a small fee. Beware that refrigerators are likely to contain Chlorofluorocarbons (CFCs). Also, white metal goods have small capacitors which may contain PCB, a hazardous waste in Vermont. (See the "Markets and Special Services Directory for Reusable and Recyclable Materials, dated February 1996, included in Appendix E.)

Ozone Depleting Substances (ODSs). It is the policy of the Corps to minimize the procurement of materials and substances that contribute to the depletion of stratospheric ozone; and give preference to the procurement of alternative chemicals and products that reduce the overall risks to human health and the environment by lessening depletion of ozone in the upper atmosphere. In addition, ODSs "Elimination Plans" are to be developed for each project. A memorandum outlining this policy is included in Appendix F.

Chlorofluorocarbons may be contained in air conditioners, water coolers, dehumidifiers, refrigerators and automobile air conditioners. CFCs are regulated under air pollution regulations. Individuals servicing and disposing of air conditioning and refrigeration equipment are prohibited from knowingly venting refrigerant into the atmosphere. At the flood control project these units are serviced off-site. The service contractor is required to provide documentation indicating that they are certified by EPA to deal with this material. Any new equipment purchased should maximize the use of safe alternatives to these ozone depleting substances.

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RESPONSIBILITIES

7-1 The Division Environmental Coordinator

The Environmental Coordinator is responsible for the following items.

- o Provide technical assistance and guidance to project manager in developing environmentally safe procedures for solid waste management.
- o Provide oversight of required permits and renewals, and EPA hazardous waste generators application numbers.
- o Review and approve Solid Waste Management Plan, revision, and amendments.

7-2 The Project Manager¹³

The Project Manager is responsible for the following items.

- o Program sufficient funds to insure compliance with solid waste management requirements.
- o Maintain a complete and current inventory of stored hazardous materials and hazardous waste at the project.
- o Assure that only those properly trained and designated by the Commander will handle hazardous waste at the project and sign hazardous waste manifests.
- o Monitor facility compliance with hazardous waste manifest procedures and

Project Environmental Compliance Coordinators (ECCs) are being designated for each river basin. One of their functions will be to support the field management of hazardous wastes.

- make recommendations for corrective actions or procedural changes when necessary or advisable.
- o Maintain copies of all relevant regulations, directives, and guidance on hazardous materials, wastes and POLs at the project and keep these materials in an organized, highly visible manner.
- o Arrange for any testing of materials suspected of being hazardous wastes.
- Inspect storage areas for malfunctions and deterioration, operator errors and discharges which may be causing or leading to the release of waste constituents into the environment or are a threat to human health. Inspections must be conducted to identify potential problems in time to correct them before a problem occurs.
- o Assure reuse of recycled materials when possible and feasible. Appropriate disposal and recycling specifications should be included in purchase requests or contracts.
- o Maintain material safety data sheets in the project office for staff to review.
- o Review this Solid Waste Management Plan and make any necessary revisions to the Plan.

TRAINING

8-1 Hazardous Waste Training

Training is an important component of regulatory compliance. Training should be carried out to ensure that all personnel working in facilities with hazardous wastes are knowledgeable of hazardous waste management requirements, emergency procedures, and spill reporting requirements.

Department of Transportation regulation 49 CFR 172.700 (Subpart H-training) requires the training of employees who load, unload or handle hazardous materials for transportation, assure the safety of the shipment, or operate a motor vehicle used to transport hazardous materials.

Only employees formally designated, trained and authorized by the Division Commander are authorized to execute hazardous waste manifests and related documents. DOT hazardous waste manifest training must be current. The formal designation and authorization must be in writing and state the member is within their scope of employment when executing such documents. Each project unit should have at least one person formally designated and trained for this function.

In addition, Vermont (VHWMR, 7-309(4)) requires all "Generators" of hazardous waste to comply with the following training requirement and documentation:

o facility personnel must successfully complete a "program" of classroom training that teaches them to perform their duties in a way that ensures' the facilities compliance with the VHWMR. The "program" requirements are detailed in the regulation. An annul review of training is also required. In addition the project manager must maintain documents and records of the training and other job and qualification information.

All hazardous waste management training should be coordinated with the Division Environmental Compliance Coordinator and Safety Officer.

8-2 Other Training

Although there is no specific training requirements for non-hazardous solid waste management, the Project Manager is encouraged to provide educational recycling information to employees for their information.

GLOSSARY TERMS AND ABBREVIATIONS

CFR - Code of Federal Regulations

Certification - A statement of professional opinion based upon knowledge and belief.

CFCs - Chlorofluorocarbons

Construction and Demolition Waste (C&D) - Construction and demolition waste (C&D) is debris generated from construction, renovation, repair, and demolition of roads, bridges, and buildings. It includes wood, steel, concrete, masonry, plaster, metal, and asphalt. These wastes have a number of beneficial uses, e.g. crushing asphalt and concrete/brick separately or in conjunction with virgin materials to produce recycled asphalt paving; process gravel, road base, and solid fill. Chipping and grinding wood treated with preservatives produces boiler fuel, a bulking agent for sludge composting; wood fiber, and erosion control for landfills. Untreated wood can be chipped for landscape mulch.

<u>Container</u> - A portable device in which a material or waste is stored, transported, treated, disposed of, or otherwise handled.

CWA - Clean Water Act

<u>Disposal</u> - The discharge, deposit, injection, dumping, spilling, leaking or placing of any solid waste or hazardous waste into or on any land or water so that such waste (or any constituent thereof) may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

DoD - Department of Defense

<u>DOT</u> - The United States Department of Transportation

ECC - Project environmental compliance coordinator

EPA - The United States Environmental Protection Agency

<u>Generator</u> - A person who produces or creates hazardous waste identified or listed under RCRA (relating to criteria, identification, and listing of hazardous waste).

HSWA - Hazardous and Solid Waste Amendments of 1984 (to RCRA)

<u>Hazardous Material</u> - (1) A substance or material which has been determined by the Secretary of the U.S. Department of Transportation to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and which has been designated. (2) Is listed in 49 CFR, Part 172.101, Hazardous Materials Table.

<u>High Grade Paper</u> - Includes letterhead, dry copy papers, miscellaneous business forms, stationery, typing paper, tablet sheets, and computer paper.

<u>Management</u> - The entire process, or any part, of storage, collection, transportation, treatment, and disposal of hazardous wastes by person engaging in such process.

<u>Manifest</u> - The shipping document EPA Form 8700-22, and if necessary, EPA Form 8700-22A, originated, signed, and distributed in accordance with the instructions supplied with the manifest form and applicable state requirements.

<u>Manifest System</u> - The manifest, instructions supplied with the manifest, and distribution system for copies of the manifest which together identify the origin, routing, and destination of hazardous waste from the point of generation to the point of treatment, storage or disposal.

NGVD - National Geodetic Vertical Datum-MSL of 1929.

OSDs - Ozone depleting substances

POL - Petroleum, oil, and lubricants

RCRA - Resource Conservation and Recovery Act of 1976. (P.L.94-580, as amended)

Resource Recovery - The process of obtaining materials or energy from solid waste.

<u>Source Separation</u> - The separation of recyclable materials at their point of generation by the generator.

<u>Storage</u> - The holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.

TCLP - Toxicity Characteristics Leaching Procedure

TSCA - Toxic Substance Control Act.

REFERENCES

- ENSR Consulting and Engineering, Acton, Massachusetts. October 1990. "A Guide to Permitting, Compliance, Closure, and Corrective Action Under the Resource and Conservation Recovery Act."
- U.S. Army Corps of Engineers, Baltimore District. July 1993. POL Waste Liquid and Hazardous Waste Management Plan for Baltimore District, Project Operations Branch.
- U.S. Army Corps of Engineers, New England Division. 1996. Environmental Compliance Assessment of North Hartland Lake, Vermont.
- U. S. Army, Corps of Engineers, New England Division. February 1995. Hazardous Waste Management Manual for U. S. Army Reserve Centers in the State of Vermont. Prepared for the Department of the Army 94th Regional Support Command. Prepared with technical assistance from ENSR Consulting and Engineering, Acton, Massachusetts.
- U.S. Army Corps of Engineers, New England Division. August 1995. Spill Prevention, Control, and Countermeasure Plan and Spill Contingency Plan for North Hartland Lake.
- U.S. Army Corps of Engineers, New England Division. Scheduled to be completed September 1996. Pollution Prevention Plan for North Hartland Lake.

APPENDIX A TOWN ORDINANCES

CHAPTER 10

TOWN OF HARTFORD, VERMONT

ORDINANCE.RELATING TO REGULATING THE COLLECTION AND DISPOSAL OF SOLID WASTE

ADOPTED BY BOARD OF SELECTMEN GCTOBER 30, 1990

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CHAPTER 10

An Ordinance Relating to Regulating the Collection and Disposal of Solid Waste

Be it ordained by the Board of Selectmen of the Town of Hartford as follows:

ARTICLE I

10.1.1

To protect the health and welfare of the citizens of Hartford and to promote the conservation of natural resources and the wise use of the environment, the Board of Selectmen of the Town of Hartford hereby adopt this ordinance to regulate the separation, recovery, collection, removal, storage and disposition of solid waste, including recyclables, in the Town of Hartford, Vermont.

ARTICLE II DEFINITIONS

10.2.1

- A. "Air Contaminants" shall mean dust, fumes, mist, smoke, other particulate matter, vapor, gas, odorous substances, or any combination thereof.
- B. "Authorization" by the Town of Hartford means authorized pursuant to a legal contract or other written authorization entered into by the Town of Hartford and a private third person as defined herein.
- C. "Emission" shall mean a release into the outdoor atmosphere of air contaminants.
- D. "Commercial Hauler" shall mean any Person who collects and/or hauls solid waste that is generated within the Town of Hartford or brings waste into the Town of Hartford that is intended for disposal at the Town's landfill site except those defined as a "Residential Hauler".
- E. "Residential Hauler" shall mean any individual who hauls residential solid waste from their own individual residence that is located within the Town of Hartford or a member community.
- F. "Incineration" shall mean the burning of solid waste in an enclosed indoor or outdoor container.
- G. "Open Fire Burning" shall mean burning of solid waste in the open where the products of combustion are emitted directly into the atmosphere without passing through a stack, chimney or other enclosure.

- H. "Person" shall mean any person, firm, partnership, association, corporation, company or organization of any kind.
- I. "Recyclable" shall mean recyclable material as specifically identified in regulations promulgated by the Board of Selectmen.
- J. "Solid Waste" shall mean any solid waste as defined in Title 10 V.S.A. section 6602 (See Appendix A for Title 10 V.S.A. Section 6602).

ARTICLE III AUTHORITY

10.3.1

In accordance with Title 10, Chapter 159 of Vermont Statutes Annotated, the Town of Hartford is responsible for the management and regulation of the storage and collection of solid wastes within the limits of the Town, in conformance with the State solid waste management plan authorized under Chapter 159 of Title 10. The Town may issue local franchises and may make, amend or repeal rules necessary to manage the storage and collection and disposal of solid waste materials within their limits and impose penalties for violations thereof, provided that the rules are consistent with the State plan and rules promulgated by the Secretary of the Agency of Natural Resources.

ARTICLE IV

10.4.1

The Board of Selectmen is authorized to employ or make contracts with individual persons for the separation, recovery, collection, removal, storage, or disposition of solid waste, including recyclables. Contracts which are awarded pursuant to this authority shall be advertised or otherwise put to competitive bid. Contracts may be rejected or awarded at the sole discretion of the Board of Selectmen for any reasons which they deem appropriate, including but not limited to, the efficiency of scale, past performance of a contractor, stability of operation, and need for competition. The Board of Selectmen may adopt regulations regulating the preparation of solid waste for collection.

All Commercial Haulers of solid waste in the Town of Hartford shall register with the Town Manager and such registration shall constitute authorization to collect solid waste but not recyclables. Authorization to collect recyclables shall be a separate authorization. Authorization(s) may be revoked for violation(s) of this Ordinance. The Board of Selectmen may designate the disposal

location for all solid waste collected within the Town limits. The Board of Selectmen may set a registration fee and may require all commercial haulers to charge for collection and hauling services on a per quantity basis. The Board may require documentation that charges are based on a per quantity basis. The information would be considered proprietary information and consequently would not be made public.

ARTICLE V PUBLIC SAFETY

10.5.1

No person having the custody or control of residential, industrial or business premises from which solid waste, including recyclables, is collected for disposal in the Town of Hartford shall permit or cause any solid waste, including recyclables, within their control to become a hazard to public travel, health or safety or to become a nuisance of any sort. Solid waste, other than yard waste, may not be deposited or otherwise left out of doors unless it has been placed in the proper container as defined by regulations promulgated pursuant to this ordinance. Household hazardous wastes may only be disposed of in accordance with regulations adopted by the Board of Selectmen from time to time.

ARTICLE VI 10.6.1 ILLEGAL DUMPING

It shall be unlawful for any person, business, or corporation to enter any Town of Hartford solid waste facility when said facility is not open; nor shall they deposit, dump, or leave solid waste of any kind in any such facility or adjacent hereto, whenever said facility is not open.

10.6.2

It shall be unlawful for any person to deposit, dump, or leave solid waste on or in any privately owned or maintained disposal container other than their own, nor any other private property, without the consent of the owner and obtaining any and all required local and state permits.

10.6.3

It shall be unlawful to deposit in a municipally owned or maintained disposal container any solid waste other than that created or originated in any public buildings/grounds/highways or on the person of anyone using said public buildings/grounds/highways.

ARTICLE VII OPEN FIRES AND INCINERATORS

Except as provided by this article, the burning of any solid waste, either by open fire or incineration, in the Town of Hartford is prohibited.

10.7.2

10.7.1

A specific written permit may be granted by the Fire Chief or his designee for the open burning of yard and garden debris including trees, stumps, brush, untreated wood, lawn clippings, and leaves; provided the Fire Chief is satisfied that no hazardous condition will be created by such burning and the emission of air contaminants will not create a danger to the health and property of the citizens of the Town of Hartford.

Permits which are issued under the provisions of this ordinance shall be for a specified date, time and location and only for specified materials. The Selectmen of the Town of Hartford reserve the right to establish a fee for the issuance of such permits.

This article does not apply to medical/infectious wastes that are incinerated at the V.A. Hospital.

ARTICLE VIII 10.8.1 SEPARATION OF RECYCLABLES

Except as hereinafter provided, recyclables from all residences shall be kept separate from other solid waste, either delivered to a private or Town collection facility, or placed at the street curb or designated area, as defined in regulations adopted pursuant to this ordinance. Recyclables placed at the curb or curbline shall be placed in a manner designated by regulation as established by the Board of Selectmen for collection on the morning of the collection day as set forth under a schedule determined by the Town Manager.

10.8.2

Apartments, condominium, businesses, institutions and industries located within the Town of Hartford shall separate recyclables from all other solid waste in accordance with regulations adopted pursuant to this ordinance and shall have an area designated for recyclables. The area so designated shall be clearly marked.

10.8.3

In accordance with regulations adopted pursuant to this ordinance, any person within the Town of Hartford may properly dispose of recyclables at private collection facilities or at collection areas maintained by the Town of Hartford or its designated agent for that purpose. Recyclables shall be separated from solid waste according to standards that shall be promulgated as regulations pursuant to this ordinance by the Board of Selectmen.

10.8.4

Placement requirements may be waived for reasons of age, infirmity or handicap.

ARTICLE IX 10.9.1 COLLECTION BY UNAUTHORIZED PERSON

It shall be a violation of this ordinance for any person not authorized by the Town of Hartford to collect or pick up or cause to be collected or picked up any solid waste, including recyclables. This does not apply to "green-up" efforts along roadways. Any and each such collection shall constitute a separate and distinct offense punishable as hereinafter provided.

ARTICLE X 10.10.1 PENALTIES & ENFORCEMENT

Any person violating any provision of this ordinance or the regulations enacted hereunder shall be fined not more than \$500 for each offense except as provided by this article.

10.10.2

The Town of Hartford, or its designated agent, reserves the right to refuse to collect solid waste or to refuse to allow disposal at any facility operated by the Town or for the benefit of the Town where this ordinance or the regulations promulgated hereunder are ignored or violated. The Town further reserves the right to terminate the authorization of any commercial or residential hauler who violates this ordinance or the regulations promulgated hereunder. Termination of authorization may include, but not limited to, revocation of license to collect, haul, and dispose of solid waste.

10.10.3

Unless otherwise provided for herein, each day that a violation shall continue or exist shall constitute a separate offense.

10.10.4

The Town of Hartford may, upon the violation of any provision of this ordinance, maintain an action to enjoin the violation of these ordinances, or any regulations adopted to implement the same, but the election of the Town to proceed with an application or petition for an injunction shall not prevent a criminal prosecution for the violation of this ordinance. Expenses incurred by such action shall be recovered by the person whose legal duty it was to comply with these ordinances.

10.10.5

Any person violating a provision under Article VIII shall be fined not more than \$100 for each offense and/or denied authorization to pick up any solid waste or dispose of solid waste within the Town of Hartford.

10.10.6

Enforcement of Articles IV, V, and VIII shall provide all persons a reasonable period of time and opportunity to correct violations prior to pursuing penalties and/or fines.

ARTICLE XI 10.11.1 INCONSISTENT REPEAL

All ordinances or parts of ordinance, resolutions, regulations or other documents inconsistent with the provisions of this ordinance are hereby repealed to the extent of such inconsistency.

ARTICLE XII 10.12.1 SEVERABILITY

This ordinance and the various parts, sentences, sections and clauses thereof, are hereby declared to be severable. If any part, sentence, section, or clause is adjudged invalid, it is hereby provided that the remainder of this ordinance shall not be affected thereby.

ARTICLE XIII EFFECTIVE DATE

10.13.1

This ordinance shall take effect on January 1, 1991.

REGULATIONS FOR THE COLLECTION AND RECYCLING OF SOLID WASTE IN THE TOWN OF HARTFORD

I. DEFINITIONS

"Commercial Solid Waste" shall mean garbage, refuse and other discarded solid materials generated by normal business and institutional activities, and having no value to the owner at the time it is discarded.

"Commercial Recyclables" shall mean corrugated cardboard, office paper, newspaper, leaves/grass and either aluminum and steel cans or glass containers.

"Waste Container" shall mean a metal or plastic garbage can or dumpster with a lid that securely fastens, or a securely tied plastic bag.

"Collection Box" shall mean a plastic bin or garbage can issued by the Town for the purpose of collecting recyclables.

"Curbside" shall mean an area adjacent to the street curb, but in no case greater than 10 feet from the curb, nor directly on the traveled portion of any Town road or sidewalk.

"Person" shall mean any person, firm, partnership, association, corporation, company, or organization of any kind.

"Designated Area" shall mean an area designated for storage of solid waste and recyclables readily accessible at all times by a conventional solid waste collection truck or mutually agreed on by the waste generator and their hauler.

"Commercial Hauler" shall mean any Person who collects and/or hauls solid waste that is generated within the Town of Hartford except those defined as "Residential Haulers".

"Residential Hauler" shall mean any individual who hauls residential solid waste from their own individual residence that is located within the Town of Hartford or a member community.

"Residential Recyclables" shall mean: clear, brown, and green glass bottles and jars; aluminum cans & ferrous (tin) cans; translucent plastic milk, cider, orange juice and water containers (high density polyethylene-HDPE); leaves; office paper; and newspaper.

"Residential Solid Waste" shall mean garbage, refuse and other discarded solid materials generated by normal household activities, and having no value to the owner at the time that it is discarded. Residential Solid Waste shall include wastes generated in single and multi-family housing, apartments, and condominiums.

"Resident" shall mean any person whose principal place of residence is within the Town of Hartford, including, but not limited to, homeowners, tenants, businesses, and corporations.

II. PLACEMENT OF RESIDENTIAL RECYCLABLES & SPECIFIED HOUSEHOLD HAZARDOUS WASTES FOR CURBSIDE COLLECTION

- 1. Specified residential recyclables and household hazardous wastes listed under a, b, & c below must be separated from Residential Solid Waste, placed in a collection box, and placed at the Curbside or Designated Area on the scheduled day for collection of recyclables in accordance with a schedule formulated by the Town Manager.
- a. All of the following materials, clear, green and brown glass containers; tin & aluminum food & beverage containers; translucent plastic (HDPE) containers, shall be rinsed with any food removed and with the tops or caps removed.
- b. All used newspapers, with glossy advertising and coupon supplements removed, shall either be placed in the recyclables collection box or bagged in brown paper bags and placed next to the collection box. Glossy advertising and coupon supplements shall be disposed of as solid waste.
- c. Household hazardous wastes that are to be placed out with the recyclables include all household batteries and used motor oil. Specific requirements for collection shall be determined by the Town Manager.

III. COMMERCIAL RECYCLABLES FOR COLLECTION

Commercial recyclables must be separated from Commercial Solid Waste and either handled by a private hauler, taken directly to a private or the Town's recycling facility(ies), or in a manner consistent with the Solid Waste Ordinance or these Regulations. Recyclables shall be prepared in accordance with specifications provided by the Hauler. Those recyclables taken to the Town's recycling facility must meet the specifications provided by the Town Manager.

IV. BRUSH AND GRASS CLIPPINGS

No grass clippings or leaves and garden organic materials

shall be disposed of with Residential or Commercial Solid Waste, but shall be disposed of in one of the following alternative disposal mechanisms:

- a. Residents & commercial establishments are encouraged to compost and mulch yard and vegetable wastes in their backyards or other locations that would not cause this material to create a nuisance.
- b. Grass clippings, leaves, and garden organic materials may be deposited in a container so marked at the Town's Recycling Center.

V. SPECIAL WASTES/RECYCLABLES

Tires, car & truck batteries, metal appliances and other large metal items shall not be disposed of with residential or commercial solid waste. These items must be removed and placed in containers provided at the Recycling Center. There will be a charge for these items as set by the Board of Selectmen.

VI. REQUIREMENT OF AUTHORIZED COMMERCIAL HAULERS

- 1. No Commercial Hauler shall knowingly collect Residential or Commercial Solid Waste which does not have Recyclables including leaves and grass clippings, tires, car & truck batteries, motor oil, household batteries, metal appliances, and other large metal items separated from it.
- 2. All Commercial Haulers shall charge customers for non-recyclable solid waste on a per quantity basis.
- 3. No Person shall collect Residential or Commercial Recyclables or Residential or Commercial Solid waste placed at the curbside or designated area unless they are authorized by the Town. Licenses shall be obtained annually through the Town Manager's Office. All Commercial Haulers shall deliver the residential and commercial solid waste they collect within the Town limits to the Hartford Landfill site unless their license states otherwise. This does not apply to medical/infectious wastes that are incinerated at the V.A. Hospital. Authorization and licenses to collect Solid Waste or Recyclables may be suspended or revoked by the Manager for failure to abide by these regulations or payment of fees and charges.
- 4. Commercial Haulers shall report to the Town Manager any obvious violation of these regulations by a Resident, Commercial Hauler, or any other person.

5. Failure to abide by these regulations may cause suspension or revocation of any authorization or license, or enforcement of any other penalties provided by law.

VII. REQUIREMENT OF SOLID WASTE/RECYCLABLES GENERATORS

Any rejected Residential or Commercial Solid Waste and/or Recyclables not properly separated or placed in accordance with these regulations shall be the sole responsibility of that homeowner, business, tenant, or corporation and shall be retrieved within 24 hours.

VIII. EFFECTIVE DATES/ENFORCEMENT

1. These regulations will go into effect on January 1, 1991. Effective date for Residential Recycling is June 1, 1991. Effective dates for Commercial Recycling is July 1 through December 31, 1991 (see schedules below).

Residential Recyclables

<u>Material</u>	Effective Dates
Glass Bottles & Jars	June 1, 1991
Cans (aluminum & steel)	June 1, 1991
Translucent HDPE	June 1, 1991
(milk jugs)	
Newspaper	June 1, 1991
Leaves	June 1, 1991
Office Paper	June 1, 1991

Commercial Recyclables

<u>Material</u>	Effective Dates
Corrugated Cardboard Newspaper	July 1, 1991 July 1, 1991
Office Paper	July 1, 1991 July 1, 1991
Leaves/Grass Glass Bottles & Jars or Cans	December 31, 1991
(aluminum & steel)	

2. The Town will pursue an enforcement policy regarding recycling requirements that shall provide all persons period

of time and opportunity to meet performance requirements and to correct violations prior to pursuing penalties and/or fines. This includes providing information and education programs and utilizing verbal warnings and written warnings prior to instituting enforcement fines and/or penalties. There shall also be a minimum six month period after ordinance adoption prior to regulation effective date(s).

3. The Town Manager or his/her designee shall be responsible for enforcement. The Board of Selectmen shall act as an Appeal Board for all appeals that are not resolved after appeal to the Town Manager.

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AN ORDINANCE RELATING TO SEPARATION OF RECYCLABLES FROM OTHER SOLID WASTE IN THE TOWN OF HARTLAND, VERMONT

ARTICLE I PURPOSE

To protect the health and welfare of the citizens of Hartland and to promote the conservation of natural resources and the wise use of the environment, the Board of Selectmen of the Town of Hartland hereby adopt this ordinance to regulate the separation, recovery, collection, removal, storage and disposition of recyclables in the Town of Hartland, Vermont.

ARTICLE II DEFINITIONS

- A. "Air Contaminants" shall mean dust, fumes, mist, smoke, other particulate matter, vapor, gas, ordorous substances, or any combination thereof.
- B. "Authorization" by the Town of Hartland means authorized pursuant to the legal contract or other written authorization entered into by the Town of Hartland and a private third person as defined herein.
- C. "Emission" shall mean a release into the outdoor atmosphere of air contaminants.
- D. "Commercial Hauler" shall mean any Person who collects and/or hauls solid waste that is generated within the Town of Hartland or brings waste into the Town of Hartland that is intended for disposal at the Town's designated landfill site except those defined as a "Residential Hauler".
- E. "Residential Hauler" shall mean any individual who hauls residential solid waste from their own individual residence that is located within the Town of Hartland.
- F. "Incineration" shall mean the burning of solid waste in an enclosed indoor or outdoor container.
- G. "Open Fire Burning" shall mean burning of solid waste in the open where the products of combustion are emitted directly into the atmosphere without passing through a stack, chimney or other enclosure.
- H. "Person" shall mean any person, firm, partnership, association, corporation, company or organization of any kind.
- I. "Recyclable" shall mean recyclable material as specifically identified in regulations promulgated by the Board of Selectmen.
- J. "Solid Waste" shall mean any solid waste as defined in Title 10 V.S.A. Section 6602.

ARTICLE III SEPARATION OF RECYCLABLES

Section 1.

Except as hereinafter provided, recyclables from all residences shall be kept separate from other solid waste, either delivered to a private or Town collection facility or the Hartford Landfill.

Section 2.

Apartments, condominiums, businesses, institutions and industries located within the Town of Hartland shall separate recyclables from all other solid waste in accordance with regulations adopted pursuant to this ordinance.

Section 3.

In accordance with regulations adopted pursuant to this ordinance, any person within the Town of Hartland may properly dispose of recyclables at private collection facilities or at collection areas maintained by the Town of Hartland or its designated agent for that purpose. Recyclables shall be separated according to standards that shall be promulgated as regulations pursuant to this ordinance by the Board of Selectmen.

Section 4.

Placement requirement may be waived for reasons of age, infirmity or handicap.

ARTICLE IV COLLECTION BY UNAUTHORIZED PERSON

It shall be a violation of this ordinance for any person not authorized by the Town of Hartland to collect or pick up or cause to be collected or picked up any recyclables. Any and each such collection shall constitute a separate and distinct offense punishable as hereinafter provided.

ARTICLE V PENALTIES & ENFORCEMENT

Section 1.

Any person violating any provision of this ordinance or the regulations enacted hereunder shall be fined not more than \$500 for each offense except as provided by this article.

Section 2.

The Town of Hartland, or its designated agent, reserves the right to refuse to collect recyclables or to refuse to allow disposal at any facility operated by the Town or for the benefit of the Town where this ordinance or the regulations promulgated

hereunder are ignored or violated. The Town further reserves the right to terminate the authorization of any commercial or residential hauler who violates this ordinance or the regulations promulgated hereunder. Termination of authorization may include, but not limited to, revocation of license to collect, haul, and dispose of recyclables.

Section 3.

Unless otherwise provided for herein, each day that a violation shall continue or exist shall constitute a separate offense.

Section 4.

The Town of Hartland may, upon the violation of any provision of this ordinance, maintain an action to enjoin the violation of these ordinances, or any regulations adopted to implement the same, but the election of the Town to proceed with an application or petition for an injunction shall not prevent a criminal prosecution for the violation of this ordinance. Expenses incurred by such action shall be recovered by the person whose legal duty it was to comply with these ordinances.

ARTICLE VI INCONSISTANT REPEAL

All ordinances or parts of ordinance, resolutions, regulations or other documents inconsistant with the provisions of this ordinance are hereby repealed to the extent of such inconsistency.

ARTICLE VII SEVERABILITY

This ordinance and the various parts, sentences, sections and clauses thereof, are hereby declared to be severable. If any part, sentence, section, or clause is adjudged invalid, it is hereby provided that the remainder of this ordinance shall not be affected thereby.

ARTICLE VIII EFFECTIVE DATE

This ordinance shall take effect June 1, 1991.

REGULATIONS FOR THE COLLECTION OF RECYCLABLES IN THE TOWN OF HARTLAND, VERMONT

I. DEFINITIONS.

"Commercial Solid Waste" shall mean garbage, refuse and other discarded solid materials generated by normal business and institutional activities, and having no value to the owner at the time it is discarded.

"Commercial Recyclables" shall mean corrugated cardboard, office paper, newspaper, leaves/grass and either aluminum and steel cans or glass containers.

"Waste Container" shall mean a metal or plastic garbage can or dumpster with a lid that securely fastens, or a securely tied plastic bag.

"Collection Box" shall mean a plastic bin or garbage can issued by the Town for the purpose of collecting recyclables.

"Curbside" shall mean an area adjacent to the street curb, but in no case greater than 10 feet from the curb, nor directly on the traveled portion of any Town road or sidewalk.

"Person" shall mean any person, firm, partnership, association, corporation, company or organization of any kind.

"Designated Area" shall mean an area designated for storage of solid waste and recyclables readily accessible at all time by a conventional solid waste collection truck or mutually agreed on by the waste generator and their hauler.

"Commercial Hauler" shall mean any Person who collects and/or hauls solid waste that is generated within the Town of Hartland except those defined as "Residential Haulers".

"Residential Haulers" shall mean any individual who hauls residential solid waste from their own individual residence that is located within the Town of Hartland.

"Residential Recyclables" shall mean: clear, brown and green glass bottles and jars; aluminum cans and ferrous (tin) cans; translucent plastic milk, cider, orange juice and water containers (HDPE); leaves; office paper; and newspaper.

"Residential Solid Waste" shall mean garbage, refuse and other discarded solid waste materials generated by normal household activities, and having no value to the owner at the time that it is discarded. Residential Solid Waste shall include wastes generated in single and multi-family housing, apartments and condominiums.

"Resident" shall mean any person whose principal place of residence is within the Town of Hartland, including, but not limited to, homeowners, tenants, businesses and corporations.

- II. PLACEMENT OF RESIDENTIAL RECYCLABLES & SPECIFIED HOUSEHOLD HAZARDOUS WASTES FOR COLLECTION
- 1. Specified residential recyclables and household hazardous wastes listed under a, b & c below must be separated from Residential Solid Waste and placed in the Town Recycling Facility or brought to the Hartford Landfill.
- a. All of the following materials; clear, green and brown glass containers; tin and aluminum food and beverage containers; translucent plastic (HDPE) containers, shall be rinsed with all food removed and with the tops or caps removed.
- b. All used newspapers, with glossy advertising and coupon supplements removed, shall either be placed directly in the Town Recycling Facility or bagged in brown paper bags. Glossy advertising and coupon supplements shall be disposed of as solid waste.
- c. Household hazardous wastes that are to be separated out with the recyclables include all household batteries and used motor oil. Specific requirements for disposal shall be determined by the Hartford Landfill.

III. COMMERCIAL RECYCLABLES FOR COLLECTION

Commercial recyclables must be separated from Commercial Solid Waste and either handled by a private hauler, taken directly to a private or the Town's recycling facility or in a manner consistent with the Solid Waste Ordinance or these Regulations. Recyclables shall be prepared in accordance with specifications provided by the Hauler. Those recyclables taken to the Town's recycling facility must meet the specifications provided by the Town Manager.

IV. BRUSH AND GRASS CLIPPINGS

No grass clippings or leaves and garden organic materials shall be disposed of with Residential or Commercial Solid Waste, but shall be disposed of in one of the following alternative disposal mechanisms:

- a. Residents & commercial establishments are encouraged to compost and mulch yard and vegetable wastes in their backyards or other locations that would not cause this material to create a nuisance.
- b. Grass clippings, leaves and garden organic materials may be deposited in a container so marked at the Hartford Recycling Center.

V. SPECIAL WASTES/RECYCLABLES

Tires, car & truck batteries, metal appliances and other large metal items shall not be disposed of with residential or commercial solid waste. These items must be removed and placed in containers provided at the Hartford Recycling Center. There will be a charge for these items as set by the Hartford Board of Selectmen.

VI. REOUIREMENT OF AUTHORIZED COMMERCIAL HAULERS

- 1. No Commercial Hauler shall knowingly collect Residential or Commercial Solid Waste which does not have Recyclables including leaves and grass clippings, tires, car and truck batteries, motor oil, household batteries, metal appliances, and other large metal items separated from it.
- 2. No Person shall collect Residential or Commercial Recyclables unless they are authorized by the Town. Licenses shall be obtained annually through the Town Manager's Office. All Commercial Haulers shall deliver the residential and commercial recyclables they collect within the Hartland Town limits to the Hartford Landfill site unless their license states otherwise. Authorization and licenses to collect Recyclables may be suspended or revoked for failure to abide by these regulations or payment of fees and charges.
- 3. Commercial Haulers shall report to the Town Manager any obvious violation of these regulations by a Resident, Commercial Hauler or any other person.
- 4. Failure to abide by these regulations may cause suspension or revocation of any authorization or license, or enforcement of any other penalties provided by law.

VII. REQUIREMENT OF RECYCLABLES GENERATORS

Any rejected Residential or Commercial Recyclables not properly separated or placed in accordance with these regulations shall be the sole responsibility of that homeowner, business, tenant or corporation and shall be retrieved within 24 hours.

VIII. EFFECTIVE DATES/ENFORCEMENT

- 1. Effective date for Residential Recycling is June 1, 1991. This includes the following materials: glass bottles and jars; cans (aluminum and steel); translucent HDPE (milk jugs); newspaper; leaves; office paper. Effective dates for Commercial Recycling is July 1, 1991 for the following materials: corrugated cardboard; newspaper, office paper; leaves/grass. Effective date for Commercial Recycling of glass bottles and jars or cans (aluminum and steel) is December 31, 1991.
- 2. The Town of Hartland will pursue an enforcement policy regarding recycling requirements that shall provide all persons period of time and opportunity to meet performance requirements and to correct violations prior to pursuing penalties and/or fines. This includes providing information & education programs and utilizing verbal warnings and written warnings prior to instituting enforcement fines and/or penalties.
- 3. The Hartland Town Manager or his/her designee shall be responsible for enforcement. The Board of Selectmen shall act as an Appeal Board for all appeals that are not resolved after appeal to the Town Manager.

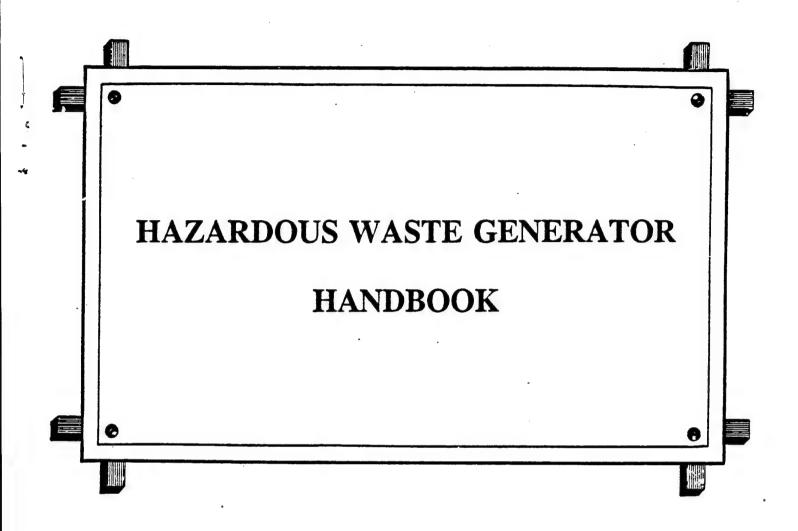
APPENDIX B

U.S. EPA IDENTIFICATION NUMBERS FOR THE FLOOD CONTROL PROJECTS (list furnished by U.S. EPA)

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PEB 1931	INS #	INSTALLATION NAME	C"?
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		DERPY OCAL PROTECTION	CT
		DICKEY/LINCOLN SCH LAKE	ME
		PAWTUXET COVE .	RI
		PLYMOUTH-LONG BEACH DIK	MA
••••		MANSFIELD HOLLOW LAKE	CT
		BIRCH HILL DAM	MA
		CAPE COD CANAL	MA
		KNIGHTVILLE DAM	MA
		TULLY LAKE	: MA
		BLACKWATER RESERVOIR	NH:
•		EDWARD MAUDUWELL LAKE	NĤ
		FRANKLIN FALLS RESERV	NH
•••		SURRY MOUNTAIN LAKE	NH
		UNION VILLAGE RESERVOIR	VT
	11421	KENNERUNK RIV JETTY	ME
		BALL MOUNTAIN RESERVOIR	VT
		HOPKINTON-EVERETT : AMOS	NH
	12535	NORTH SPRINGFIELD LAKE	VT
	_ 12541	THOMASTON DAM	CT
		TOWNSHEND LAKE	VT
	12545	HODGES VILLAGE DAM	MA
	12566	EAST BRIMFIELD LAKE	MA
	12547	SUFFUMUTILE SESERVOIR	MA
	12568	BARRE FALLS RESERVUCE	MA
officers and the second of the		OTTER BROOK RESERVOIR	NH
	12580	NORTH HARTLAND LAKE	VT
	13528	WEST HILL DAM	MA
		WESTVILLE LAKE	MA
	14726	LITTLEVILLE LAKE	MA
		RELAY STATION BUILDING	HA
we will be a second of the sec		HANCOCK BROOK LAKE	CT
	15503	NORTHFIELD BROOK LAKE	CT
	15512	WEST THOMPSON LAKE	CT
	16060	CHICOPEE FALLS LOCAL PR	MA
the section of the engine	16061	CUNANT BROOK DAM	MA
		RELAY STATION BUILDING	er er
		PT JUDITH BREAKWATER SI	RI
		COLEBROOK RIVER LAKE	CI.
	19337	HOP BROOK LAKE	CT
		RELAY STATION BUILDING	VT
	19808	PBLACK PROCK LAKE	CT
•		COLEBROOK RIVER LAKE	MA
	32394	CHARLES RIVER NVS	MA

APPENDIX C

GENERAL INFORMATION ON STATE HAZARDOUS WASTE PROGRAM



Department of Environmental Conservation Hazardous Materials Management Division 103 South Main Street/West Office Waterbury, Vermont 05671-0404 (802) 241-3888 May 1994

A GUIDE TO HAZARDOUS WASTE MANAGEMENT

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PLEASE READ

This handbook is intended for use as a guidance document only. It is to be used as a reference to the basic requirements of Vermont's Hazardous Waste Management Regulations as they apply to hazardous waste generators. Persons using this document should clarify any questions by either reviewing the appropriate sections of the Regulations or contacting the Hazardous Materials Management Division at 802-241-3888.

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INTRODUCTION

The development of solvents and chemical production processes went largely unregulated for the first half of this century. Health and environmental effects of chemical dumping became apparent in the 1970's. Perhaps the most well known example of this in the nation, Love Canal in New York state, contributed impetus for the creation of laws to control how hazardous wastes are managed. Vermont has adopted its own laws implementing requirements of the Federal environmental protection laws otherwise known as the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response Compensation and Liability Act (CERCLA or Superfund). Vermont's Hazardous Waste Management Regulations (VHWMR) were developed to implement these environmental protection laws with the primary goal being the protection of human health and the environment by preventing hazardous waste releases. Management of hazardous wastes in accordance with the VHWMR will result in compliance with RCRA and substantially reduce potential liability for cleanup of business locations as a result of current and future operations. Cleanup costs are typically much greater than costs for proper management.

This handbook has been created to help Vermont businesses determine if they are subject to the "generator" requirements of the VHWMR and, if so, to outline their responsibilities for effective hazardous waste management.

To assist readers in referencing the information provided in this handbook to the VHWMR, the relevant Section or Subchapter of the VHWMR is indicated, as needed, by either bold type or parentheses.

WHAT IS HAZARDOUS WASTE?

Business owners are responsible for knowing if the waste that they generate is hazardous waste. Subchapter 2 of the VHWMR identifies those wastes that are regulated as hazardous wastes in Vermont. Each of these wastes is either included on at least one of five (5) lists (i.e. listed wastes), or exhibits one of four (4) characteristics (i.e. characteristic wastes). A more detailed description of listed and characteristic wastes is provided later in this section.

All hazardous wastes are identified by a code that consists of a capital letter(s) followed by a number (examples: D001, F002, K095, U237, P003, or VT02). The letter part of the code indicates either the specific list on which the waste is included or the specific characteristic that the waste exhibits; the number is specific to the type of waste. Some wastes may be identified by more than one code. An example is waste acetone solvent that exhibits the characteristic of ignitability (D001) and is listed (spent non-halogenated solvents / F003).

Hazardous Waste Characteristics

- 1. Ignitability (D001). Wastes that have a flashpoint of less than 140° F are ignitable. Examples are waste gasoline, mineral spirits parts washing solvent, and paint thinner.
- 2. Corrosivity (D002). Wastes that are liquid and have a pH of ≤ 2.0 or ≥ 12.5 are corrosive. Examples are acid and caustic solutions.
- 3. Reactivity (D003). Wastes that undergo a rapid or violent reaction when exposed to water, shock, heat or pressure are reactive. Examples are perchlorate and peroxide.
- 4. Toxicity (D004-D043, VT12, VT13). Wastes containing small amounts of any one of ten (10) metals or thirty-one (31) organic compounds <u>may</u> exhibit the toxicity characteristic. To determine if a waste contains enough of one of these contaminants to exhibit the toxicity characteristic, the generator can either submit a sample for laboratory analysis or rely on knowledge of the waste or the process generating the waste. An example is debris from sandblasting an item painted with lead-based paint (D008).

Hazardous Waste Lists

- 1. F... wastes (F001-F039'). Wastes from various general manufacturing or chemical processes. An example is spent cyanide plating bath solution from electroplating operations (F007).
- 2. K... wastes (K001-K136). Wastes from specific manufacturing or chemical processes. An example is wastewater treatment sludge from the production of zinc yellow pigments (K004).
- 3. U... wastes (U001-U359). Wastes that are either discarded or off-specification chemical products. Examples include benzene (U019) and chlordane (U036).
- 4. P... wastes (P001-P123*). Wastes that are acutely hazardous. An example is arsenic acid (P010). Please note that the VHWMR identify some special management requirements for these wastes due to their extremely hazardous nature.
- 5. VT... wastes (VT01-VT11*). Wastes that are not regulated as hazardous wastes by the U.S. Environmental Protection Agency (EPA) but that are considered hazardous in Vermont. An example is sorbent contaminated with > 5% by weight petroleum distillates (VT02).
- * Note that some of these codes are not yet assigned; examples include F013 through F018

AM I A GENERATOR?

Any Vermont business that produces hazardous waste is classified as either a Conditionally Exempt Small Quantity Generator (CESQG) or a Generator. This handbook is intended for use only by Generators.

The criteria for these two categories are discussed below. While reviewing this information, keep in mind that:

- a business must evaluate the rate at which all hazardous waste is generated and the quantity of waste that is accumulated on-site.
- hazardous waste that is **recycled** (Subchapter 6) either on or off-site counts toward generation rate. A common example of a waste that is recycled off-site is mineral spirits solvent from parts washing units that are maintained by a contractor.
- wastes that are exempt from the provisions of the VHWMR (Section 7-203 and Subchapter 6) should not be considered when determining regulatory status. Examples of exempt wastes include waste oil that is re-refined, lead-acid batteries that are sent offsite for recycling and some petroleum contaminated soils (VHWMR Section 7-203 [16]) that are handled in accordance with Agency guidelines (copies of the Hazardous Materials Management Division document "Agency Guidelines for Petroleum Contaminated Soil and Carbon Media" are available upon request).

Your firm is a CESQG if:

it generates less than 220 pounds (100 kg) of hazardous waste in every month of the year and falls below the Generator criteria identified below. CESQGs should request the Hazardous Materials Management Division publication "Exempt Small Quantity Generator's Handbook; A Guide To Hazardous Waste Management".

Your firm is a Generator if:

- it generates more than 220 pounds* (100 kilograms) of hazardous waste per month (in any one month of the calendar year); or
- it generates more than 2.2 pounds (1 kilogram) of acutely hazardous waste per month (P... listed wastes); or
- it generates more than 220 pounds (100 kilograms) of hazardous spill debris per month; or

- it accumulates more than 2200 pounds (1000 kilograms) of hazardous waste at any one time.
- In general terms, 220 pounds of a liquid (water-based) waste fills about one-half of a 55-gallon drum, and 2200 pounds fills about five 55-gallon drums. These volume estimates may vary, depending on the type of hazardous waste. For example, waste paint filters may weigh as little as 60 pounds per drum, while grinding sludge, contaminated soils, and oil-soaked sorbent may weigh as much as 800 pounds per drum.

REGULATORY REQUIREMENTS

Generators are required to comply with the VHWMR and are subject to unannounced inspections by Hazardous Materials Management Division (HMMD) inspectors. A copy of the checklist used by the inspectors is provided as Appendix B. Occasional review of the inspectors' checklist will assist generators in evaluating whether or not they meet VHWMR requirements.

VHWMR requirements that apply to generators may be loosely divided into the categories of **Documentation** and **Waste Handling**.

DOCUMENTATION

There are eight (8) documents / forms that every generator is, in some way, responsible for: a brief description of each follows. It is the generator's responsibility to ensure that the information in these documents is accurate and complete.

1. Notification of Hazardous Waste Activity Form (VHWMR Section 7-104)

This one page form, which is available from the HMMD upon request, requires general information about the generator and the hazardous wastes generated. Completed notification forms must be submitted to the HMMD and must be updated whenever the reported information changes. A copy of a notification form is provided as Appendix C.

Once the form has been filed with the HMMD, a site-specific EPA Identification Number is issued to the generator. This number, which is comprised of the letters VTD followed by nine digits (e.g. VTD123456789), is required information on hazardous waste labels, manifests and annual reports.

2. Manifests (VHWMR Subchapter 7)

When generators ship hazardous wastes off-site for treatment, storage or disposal, a hazardous waste manifest must be used. This document is used to track waste from the site of generation to the final disposal site. Most states have developed their own manifest forms.

Vermont's manifest document includes eight (8) copies of the one page manifest form. Each copy serves a specific role in tracking hazardous waste (directions are provided at the bottom of each copy). Generators must retain a copy of the manifest upon shipment and must receive a copy completed by the Treatment, Storage or Disposal Facility (TSDF) within 35 days of shipment. Additional documentation is required for wastes that are exported (Section 7-705) to a foreign country.

Manifests, which are usually provided to the generator by the transporter or TSDF, are also available from the HMMD upon request. A copy of a Vermont manifest is provided as Appendix D.

All manifested hazardous waste shipments are subject to Vermont hazardous waste taxes; quarterly tax bills are issued by the HMMD. The tax rate structure is designed to encourage generators to ship wastes for recycling or treatment rather than for storage or landfill disposal. The per pound/per gallon rates for recycling or treatment are less than those for the other disposal options. For more information about hazardous waste taxes, contact the HMMD.

3. Land Disposal Restriction (LDR) Notification Forms (VHWMR Section 7-106)

Certain hazardous wastes are restricted from land disposal (even at land disposal facilities certified to accept some hazardous wastes). Generators of these restricted wastes must provide written notification to the TSDF receiving these wastes. A copy of this LDR Notification Form must be retained by the generator for five (5) years from the date of shipment.

Notification forms are generally developed by, and available from, the TSDF and/or transporter that is contracted by the generator to handle the waste. These forms are not uniform even though specific information is required for adequate facility notification.

A copy of the EPA guidance document "Land Disposal Restrictions; Summary Of Requirements" is available from the HMMD upon request.

4. Contingency Plan (VHWMR Section 7-309 [3])

This plan, which is developed by the generator, describes the specific actions to be implemented in the event of an imminent or actual emergency involving hazardous wastes. An example of a contingency plan is provided as Appendix E (although this generic plan includes all required elements, it must be modified to address your facility).

The required elements of a contingency plan include identification of the individuals responsible for coordinating the plan's implementation, a list of the available emergency equipment and information about the location of that equipment, the specific procedures to be followed in the event of an emergency, and an evacuation plan. A copy of a current contingency plan must be submitted to local authorities including police, hospitals, fire departments, and emergency responders.

A contingency plan must be updated whenever:

- the applicable regulations change
- the plan fails in an emergency
- . the facility changes (in a way that effects the content of the plan)
- the list of emergency coordinators changes
- . the list of emergency equipment changes

For assistance in developing a contingency plan that also meets VOSHA requirements, contact the VOSHA Consultation Program at (802) 828-2765.

5. Personnel Training Plan (VHWMR Section 7-309 [4])

This plan, also developed by the generator, must outline a training program for all hazardous waste handlers and managers. Adequate training ensures that these personnel are familiar with waste handling requirements and the contingency plan.

Generators are required to maintain records documenting both initial training provided to new employees and annual update training. Training records for current employees must be kept on file until closure of the facility. Training records of former employees must be kept for three years from the date that the employee last worked at the facility. Records that identify the job titles and job descriptions for each employee that handles or manages hazardous waste must also be maintained.

Generators must also comply with VOSHA requirements and local fire and safety codes. For assistance in creating a Personnel Training Plan that takes into account hazardous materials as well as hazardous wastes, contact the VOSHA Consultation Program at (802) 828-2765.

6. Toxics Use Reduction Plan/Hazardous Waste Reduction Plan

Beginning in 1993, generators of more than 2640 pounds of hazardous waste per year were required to prepare a Toxics Use and Hazardous Waste Reduction Plan. Plan summaries must be submitted to the Pollution Prevention Division of the Department of Environmental Conservation.

The Toxics Use / Hazardous Waste Reduction Plan must examine methods for reducing the amount of toxic substances used and the amount of hazardous wastes generated. An implementation schedule must be established for those methods or strategies identified in the plan that are technically and economically feasible. For more information contact the Pollution Prevention Division at 1-800-974-9559.

7. Annual Reports (VHWMR Section 7-802)

Annual reports summarize a generator's hazardous waste activity from the previous calendar year. Generators must submit an annual report to the HMMD by March 1 of each year. Generators that do not receive a report form from the HMMD by the first of January should request one.

8. Other

The inventory and inspection logs that are required for the short-term storage of hazardous wastes are discussed in the Handling Requirements section of this handbook.

HANDLING REQUIREMENTS

Generators must handle hazardous wastes according to the requirements outlined in Subchapter 3 of the VHWMR. A brief description of each of these requirements follows.

Storage of waste containers except that which meets "satellite accumulation" criteria is limited to 90 days for generators of 2200 pounds or more per month; generators of less than 2200 pounds per month may store wastes for no longer than 180 days. A generator must ship stored waste to a certified TSDF or recycler before exceeding these timeframes. To store wastes for longer than 90 or 180 days, a facility must become certified as a hazardous waste storage facility. (If, for an unforeseen circumstance, the generator is not able to ship stored hazardous waste within the appropriate timeframe, the HMMD may grant a 30-day extension. Extensions are evaluated on a case-by-case basis.)

Containers. Hazardous wastes must be accumulated and stored in containers that are compatible with the waste and that are in good condition. Containers must be Department of Transportation approved for highway transportation.

- Tanks. A generator storing hazardous wastes in tanks must comply with secondary containment, monitoring, tank testing and other requirements of the Federal Hazardous Waste Regulations. Contact the HMMD for more information about these requirements.
- "Satellite" Accumulation. Up to 55 gallons of hazardous waste may be accumulated at or near the point where the waste is generated if the waste is under the control of the operator of the process generating the waste. The container accumulating the waste must be kept covered. It must also be marked to identify the type of waste and to indicate that the waste is hazardous waste. A satellite accumulation container must be moved to the short-term storage area within three days of becoming full (Section 7-308 [5]).
- Short-Term Hazardous Waste Storage Area. Full containers of hazardous waste, and any accumulation containers that are not "satellite" accumulation containers, must be stored in a designated short-term hazardous waste storage area. Tanks used to store hazardous waste must also meet the short-term storage requirements.

Requirements of short-term hazardous waste storage areas:

- √ The area must be properly identified by a warning sign bearing the words: Hazardous Waste Storage Area Authorized Personnel Only. If ignitable wastes are stored, a "No Smoking" sign must also be posted.
- The storage area floor must be impermeable, and the storage area must be protected from rain and snow.
- Containers must be labeled to identify the contents and to indicate that the container holds hazardous waste. The label should also include the date when the drum was filled, the generator's name and address, EPA ID Number, and other required language. Labels are available from various vendors.
- √ Containers must be kept closed. Evaporation of waste from open containers is prohibited.
- √ Containers must be stored with a minimum of 24" of aisle space between rows so that containers / labels are accessible.
- ✓ Safety and emergency equipment must be available in the storage area. Examples of required equipment include a communication device or alarm, a fire extinguisher and spill control equipment.

- √ Daily inspections of the storage area must be conducted to ensure that containers are in good condition and that there is adequate safety equipment and aisle space. These inspections must be documented in a logbook that is signed and dated by the inspector.
- An inventory of all hazardous waste in storage must be kept at a location apart from the storage area. This is necessary so that, in the event of an emergency, a record of stored hazardous wastes is available.
- $\sqrt{}$ Incompatible wastes (e.g. acids and bases) must be kept separate from each other in the storage area.
- √ Local fire and safety codes, as well as other applicable regulations (such as VOSHA), must be adhered to.

TRANSPORT REQUIREMENTS

Hazardous waste shipped off-site must be transported by an Agency of Natural Resources certified hazardous waste transporter using a manifest. Transporters are required to maintain a copy of a valid Vermont certification in each vehicle used to transport hazardous waste. The vehicles used for transport are permitted by the Department of Motor Vehicles (828-2073).

A list of Vermont certified transporters is available at no charge from the HMMD. Please note that a generator should use discretion when selecting a hazardous waste transporter as the generator is still responsible for the proper management of waste during transport.

HAZARDOUS WASTE REDUCTION/POLLUTION PREVENTION

There are many advantages to reducing the amount of hazardous waste generated. Some advantages are reduced regulatory burden, reduced liability, increased worker safety, and reduced costs for disposal of waste. By implementing the following suggestions, most generators can reduce, or possibly eliminate, hazardous wastes currently generated.

Inventory Management

- Inventory all hazardous chemicals used and determine if it is necessary to use
- Employ a "first-in, first-out" system of inventory to ensure that materials do not expire and become hazardous waste.

Page 9

Process Modification

- ► Get feedback from employees on modifications and techniques that can reduce hazardous waste generation.
- Substitute non-hazardous materials for hazardous materials if possible.
- Modify processes to reduce hazardous waste generation; eliminate unnecessary cleaning steps, utilize counter-current flow in processes, or install closed-loop recycling systems.
- ► Improve process efficiency.
- Perform regular preventive maintenance on equipment.
- Improve housekeeping practices to prevent spills, leaks, or contamination of chemicals which would generate hazardous waste.

Recovery and Reuse

- ▶ Recover and recycle hazardous waste on-site.
- Reuse waste in the process, or in other processes.

The suggestions listed above are general and may be implemented by most hazardous waste generators. If you would like technical assistance that is specific to your waste generating processes or more information about pollution prevention, contact the Pollution Prevention Division at 1-800-974-9559. Technical reference materials, case studies and on-site assistance are available. Assistance is confidential and free.

Contact List

Hazardous Waste:

CONTACT: Hazardous Materials Management Division

Department of Environmental Conservation

103 South Main Street/West Building Waterbury, Vermont 05671-0404

(802) 241-3888

To Report Accidents or Spills of Hazardous Waste:

CONTACT: National Response Center (800) 424-8802

Vermont Emergency Management Hotline (800) 641-5005

Pesticide Wastes and Spraying:

CONTACT: Vermont Department of Agriculture

116 State Street/Drawer 20

Montpelier, Vermont 05620-2901

(802) 828-2420

Discharges to Groundwater:

CONTACT: Water Supply Division

Department of Environmental Conservation

Old Pantry Building

Waterbury, Vermont 05671-0483

(802) 241-3400

Hazardous Waste and Toxics Use Reduction Technical Assistance:

CONTACT: Pollution Prevention Division

Department of Environmental Conservation

103 South Main Street/West Building Waterbury, Vermont 05671-0404 (802) 241-3888 or 1-800-974-9559

Solid Waste Management:

CONTACT: Solid Waste Management Division

Department of Environmental Conservation 103 South Main Street/Laundry Building

Waterbury, Vermont 05671-0407

(802) 241-3444

Federal Hazardous Waste Regulations:

CONTACT: U.S. EPA - Region I

JFK Federal Building Boston, MA 02203 (617) 573-5770

or RCRA/Superfund/Underground Storage Tank Hotline 1-800-424-9346

Vermont Agency of Natural Resources Department of Environmental Conservation Rezerdous Materials Management Division

A SECTION AND THE STATE OF THE PROPERTY OF THE

HAZARDOUS WASTE INSPECTION CHECKLIST

GENERATOR
File #: Name: Last Inspection:
Inspection Category RCRA Notifier as (Federal): Generator (>1000): (100-1000): (<100-1000):
Phone No: () Transporter: Contact: Title: Enforcement Action Contact: Follow-up: Complaint: Other (Specify):
D) Products:
Corporate Headquarters:
Consultants:
Transporters:

RECORD REVIEW

General

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N/A_	N/A	N/A			N/A	N/A	N/A	N/A	N/N
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Did the generator file a notification form?	Did the generator make a hazardous waste determination for all waste generated?	Are test results maintained for three years after final disposal off-site for any hazard determination?		Hanifests	Did the generator use the appropriate uniform Hazardous Waste Manifest?	is the facility designated on each manifest?	Is the transporter's name, signature and date of acceptance on the manifest?	is hazardous waste offered for shipment to transporters and TSDs with EPA ID numbers?	If the waste is not considered hazardous in the disposal state, does the facility have that state's authorization to receive the waste?
7-305(1)	7-304	7-804(1)(b)	Comments:		7-702(1)(8)	7-702(1)(b)	7-702(1)(d)	7-306(1)	7-306(3)
	Did the generator file a N. N. N. N. M. N. M.	Did the generator file a N N N N N N N N N N N N N N N N N N	Did the generator file a N N N N N N N N N N N N N N N N N N	Did the generator file a N N N N N N N N N N N N N N N N N N	Did the generator file a NANALIGETE of the generator make a hazardous waste determination for all waste generated? (b) Are test results maintained for three years after final disposal off-site for any hazard determination? NANALIZETE	Did the generator file a N/A notification form? Did the generator make a hazardous waste determination for all waste generated? Are test results maintained for three years after final disposal off-site for any N/A hazard determination? Hanifests Bid the generator use the appropriate uniform Hazardous N/A N/A N/A Maste Manifest?	Did the generator file a	Did the generator file a	Did the generator file a Y N/A N/A Did the generator make a hazardous waste determination for all waste generated? Are test results maintained for three years after final disposal off-site for any hazard determination? Hanifeste (a) Did the generator use the appropriate uniform Hazardous W N/A N/A N/A Haste Hanifest? (b) E the facility designated on sech manifest? (c) Is the transporter's name, signature and date of acceptance on the manifest? (d) signature and date of acceptance on the manifest? (e) shipment to transporters and TSDs with EPA ID numbers? (e) whipment of a D numbers? (f) whipment of stansporters and TSDs with EPA ID numbers?

•	N H/A			N N/A	N/A	N N N	N N/A	N/A/N	N N/A	N/A	N N/A	
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		A description of the means by which each shipment of waste will be transported (e.g., mode of transportation, type(s) of	A description of the manner in which the hazardous waste will be treated, stored or disposed of in the receiving country?	The name and site address of the consignee and any alternate consignee?	The name of any transit countries through which the waste will be sent, the length of time, and the nature of waste handling during such transit?	Was an EPA notification sent to the Office of International Activities?	Has the receiving country consented to accept the waste?	Does a copy of the EPA Acknowledgement of Consent accompany the shipments?	Are copies of each notification of intent to export kept for three years?	Are copies of the EPA Acknowledgements of Consent Kept for three years?	Are completed manifests from the consignee kept for three years?	
	7-705(2)(a)(11)(D)	7-705(2)(a)(ii)(E)	7-705(2)(a)(11)(F)	7-705(2)(a)(11)(G)	7-705(2)(a)(11)(H)	7-705(2)(b)	7-705(1)(b)	7-705(1)(c)	7-804(4)(a)	7-804(4)(b)	7-804(4)(c)	Comments:
	N/A	N/A		l l			N/A	N/A		N/A	N/A	N/A
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	Did the generator complete the generator's portion of the manifest before offering the waste for shipment?	Are all signed copies of the manifests retained for at least three years?	Have completed copies arrived within thirty-five (35) days from the facility or sixty (60) days from the foreign consigned (If no, see			Did the generator notify EPA	export of a hazardous waste? Did the notification include:	The generator's name, mailing address, telephone number and EPA identification number?	By consignes: A) A description of the hazardous A) waste FPA code nor eximating	code? hazard class and DOT code?	period of time for waste to be exported? (not to exceed 12 months per notification)	The estimated total quantity of waste?
	7-306(4)	7-702(1)(e)	7-702 (1) (K)	Comments:		7-705(2)(a)	Did	7-705(2)(a)(1)	By 7~705(2)(a)(11)(A)	7-708 (2) (4) (4) (8)		7-705(2)(a)(11)(c)

containt actions ust take to 7-309(3)(a) or any non-sudden waste	o by local ire s, contractors redinate resuant to Y N/A N/A	ty Y N	luding Y N/A N/A notes on Y N/A N/A notes on Y N/A notes police nospitals, regency Y N/A N/A
Does the	2		signals to be used to begin evacuation, evacuation routes and alternate evacuation routes? Are copies of the contingency plan and all revisions maintained at the facility and submitted to all local police and fire departments, hospitals, response teams that may be called upon to provide emergency services?
Y N/A Y N/A	Y N/A 7-309(3)(a)(111) Y N/A 7-309(3)(a)(111)	N N/A 7-309(3)(a)(v)	70309(3)(a)(v1) NA 7-309(3)(b)
led for: manifest five oreign 0)	For waste returned to the United States? Are exception reports kept on file for three years?	Annual Reports Did the generator file an annual report? Are annual reports kept for three years?	Does the owner or operator have a written contingency plan for the facility?
7-707(1)(a)	7-804(1)(a) Comments:	7-802(1) 7-804(1)(a)	

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7-109(3)(e) Emergency Procedures:	Whenever there is an imainent or actual esergency situation does the emergency coordinator (or his designes when the emergency coordinator is on call) know to do the following immediately:	7-309(3)(e)(1) Activate internal facility alarms or communication 8ystems? 7-309(3)(e)(11) Notify appropriate state or	7-309(3)(a)(iii) If a release has occurred, identify the source, character, amount and extent of any record	7-309(3)(e)(iv) Assess hazards to human health and the environment, considering all direct and indirect 7-309(3)(e)(v) If the emergency coordinator determines that the facility has health or the environment cutside which could threaten human health or the environment cutside that	7-309(3)(e)(v)(A) Determine if local evacuation may be necessary, and, if so, notify appropriate local authorities and be evaluable to assist local authorities in evacuation measures? 7-309(3)(e)(v)(B) Notify the National Response Center (800-424-8802) and indicate his or her name and	address of the facility; time and address of the facility; time and type of inddent; quantity of material(s) involved to the extent known and possible hazards to human health or the environment outside the facility?	7-309(3)(e)(vi) Take all reasonable messures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous waste at the explosion.
7-109(1)(c) Mas the contingency plan been reviewed and immediately amended whenever:	7-309(3)(c)(1) Applicable regulations are Y N/A N/A T-309(3)(c)(11) The plan fails in an	Y N/A	waste constituents, or changes the response necessary in an emergency? The list of emergency Coordinators changes?	Y	emergency ls emergency amiliar with amiliar with cility's tracteristics of cation of all cility and the commit the commit the arry out	Y N/A N/A	

cy Y N N/A	esigned to ensure that a effectively to energency procedures, tems, including,	Z		Y H H/A	Y N/A	Y N H/A	Y N N/A		W W		Y H/A	Y N N/A
hazardous waste management procedures (including confingency plan implementation) relevant to the positions in which they are employed?	it a minimum, is the training program designed to ensure that facility personnel are able to respond effectively to energencies by familiarising them with energency procedures, emergency equipment and emergency systems, including, where applicable:	Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment?	Key parameters for automatic waste feed cutoff systems?	Communications or alarm systems?	Response to fires and explosions?	Response to groundwater contamination incidents?	Shutdown of operations?	Did facility personnel successfully complete the program required in Section	7-309(4)(a)-(c) within six months after the date of their employment or assignment: to a facility or to a new position at a facility, whichever is later?	Are employees working in supervised positions until they	have completed the training requirements of Section 7-309 (4)(a)-(c)?	Do facility personnel take part in an annual review of the initial training required under Section 7-309(4)(a)-(c)?
	7-309(4)(c) Re fa	7-309(4)(c)(1)	7-309(4)(c)(11)	7-309(4)(c)(111)	7-309(4)(c)(1v)	7-309(4)(c)(v)	7-309(4)(c)(v1)	7-309(4)(d)				(e) (e) (c)
These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.	ions sion ordinator sure	ruptures in valves, pipes or other equipment, wherever this is appropriate? Immediately after an emergence:	the emergency coordinator must provide for treating, storing or disposing of recovered waste,	contaminated soil or surface Water, or any other material that results from a release,	fire or explosion at the	Ensure that in the affected areas of the facility, no waste that may be incompetible with the released	material is stored until cleanup procedures are completed and	all emergency equipment is cleaned and restored to a v N N/A N/A		Personnel Training	Facility personnel must successfully complete a program of classroom instruction that teaches them to perform their the sail a way that ensures the facility's compliance with the facility's	Is the program directed by a person trained in herardous waste management procedures and does it include instruction which teaches facility personnel
	7-309(3)(e)(vii)	7-309(3)(6)(4111)				7-309(3)(e)(1x)			Comments:		7-309(4)(a) Fac	7-309(4)(b)

or maintain the following documents	### generators 100-1000 kg/month (220-2200 lbs/mo): addition 7-308(2) Btorage less than 180 days? Y N N/A N/A	Tor generators >1000 kg/month: 7-108(1)(b) Storage less than 90 days? Y N Comments:	, z	the che wastes and container Y N N N N/A Y= 108(5)(b) Is the container closed except when adding or removing Y N N N N N N N N N N N N N N N N N N	Y N/A Y-308(5)(c) Is the container labeled with the words "Hazardous Waste" and other words that identify the contents? 7-308(5)(d) Are full drums (55 gallons) stored less than three days at the satellite area?	,
Does the owner or operator maintain the following and records at the facility:	The job title for each position at the facility related to hazardous waste management and the name of each employee?	A written job description for each position under Section 7-309(4)(f)(i) which includes the requisite skill, education or other qualifications and duties of personnel assigned to each position?	A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under Section 7-309(4)(f)(i)?	Records that document that the training or job experience required has been given to and completed by facility personnel in accordance with Section 7-309(4)(a)-(e)?	Are training records kept on current personnel until closure of the facility? Are training records on former employees kept for at least three years from the date the employee last worked at the facility?	The Secretary may independently varify successful completion of the instruction program in Section 7-309(4)(c) by examining trainess, employess or utilizing other appropriate methods.
7-309(4)(f) D	7-309(4)(£)(1)	7-309 (4) (£) (££)	7-309(4)(E)(111)	7-309(4)(£)(£v)	7-309(4)(£)(v)	7-109 (4) (g).

Y H H H/A	M/A/W M/A	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\					Y N/A	Y N N/A	Y N N/A	lty.	Y	1
Are hazardous wastes kept segregated from other incompetible wastes or materials?	Are labels visible on all drums in storage? Are containers clearly marked with: Generator name and address? Identification number?					<pre>Pre-Transport Requirements Is the waste packaged in</pre>	Accordance to U.S. Dor Regulations?	<pre>Is all DOT labeling included? Is the waste properly marked</pre>	for shipment? Preparedness and Prevention	Is the facility maintained in a manner to minimize the possibility of fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or	hazardous Waste constituents to air, soil, groundwater, or surface water which could threaten human health or the environment?	Internal communication or alarm system?
7-309(5)(c)(1v)(c)	7-309(8)(c)	Comments:				7-307(1)		7-307(3)		7-309(2)		7-309(2)(a)(1)
	N N/A	Y N/A	Y N N/A	Y N/A	Y N/A	Y H/A	Y N N/A	Y N/A	Y N N	Y N/A	Y H/A	Y N/A
DEBIGNATED STORAGE AREA Begueily	Does the generator have a sign located at each storage area indicating "Danger-Hazardous Waste Storage Area-Authorized Personnel Only" or other similar legend which is visible at	is a "No Smoking" sign posted for ignitable wastes in storage? Design Standards	Impervious storage surface?	Structure to shed snow and ice?	Preventive measures for storage of freezable waste?	Are the containers in good condition?	Are the wastes stored in compatible containers?	Is there adequate aisle space (24" wide)?	Are containers not opened, handled or stored in a manner which may rupture the container or cause it to leak?	Are ignitable or reactive wastes located at least fifty (50) feet from the property line?	Are no incompatible wastes or incompatible wastes and materials placed into the same containers?	Are no hazardous wastes placed in unwashed containers which previously held an incompatible waste or material?
	7-309(7)(a)	7-309 (7) (b)	7-309(9)(a)	(d) (9) 60°-7.	7-309(9)(d)	7-309(5)(a)	7-309(5)(b)	7-309(8)(d)	7-309(5)(0)(11)	7-309(5)(c)(111)	7-309 (5) (c) (1v) (A)	7-309 (5) (c) (1v) (B)

		Y/Y X/Y	
7-309(2)(a)(111)	Pire extinguisher and spill cleanup control equipment?		
7-309(2)(a)(1v)	Water supply for fire- fighting or sprinkler/foam system?	۱ء.	
7-309(2)(b)	is all required equipment tested and maintained?	2	Photos Taken
7-309(2)(c)	Do employees handling hazardous waste have immediate access to a communication device or alarm system?	Y N H/A	
Comments			
	INVENTORY AND INSPECTION LOGS		
7-309(1)(a)	Is a current hazardous waste inventory list maintained?	Y N H/A	Potential for Imminent Maserd, Mir, or Water Discharge Violations
7-309(1)(b)	In a daily inspection conducted and a checklist for each storage area for the following:	Milst maintained	
7-309(1)(b)(1)	Condition of drums?	Y N N/A	
7-309 (1) (b) (11)	Safety and emergency equipment?	Y N/A	
7-309(1)(b)(111)	Aisle space?	<u>_</u>)
7-309(1)(b)(1v)	Problems encountered/corrective actions?	z	Proximity to Residential Ares, Surface Mater, Recharge Sone, etc.
7-309(1) (b) (v)	Date of inspection/Inspector's signature?	X N N/A	
Comments:			

BW8/at/inspect.ls: December 30, 1993

Form Approved. OAAB No. 2050-0028. Expres 9-30-92
GSA No. 0744-EPA-OT

Please rater to the Instructions for Filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

Date Received (For Official Use Only)

of the Resource Conservation United States Environmental Protection Agency and Recovery Act). Linstallation's EPA ID Number (Hark 'X' in the appropriate box) C, Installation's EPA ID Number B. Subsequent Notification A. First Notification (complete item C) II. Name of installation (include company and specific site name) III. Location of Installation (Physical address not P.O. Box or Route Number) Street (continued) State ZIP Code City or Town County Code County Name IV. Installation Mailing Address (See Instructions) Street or P.O. Box State ZIP Code City or Town V. Installation Contact (Person to be confacted regarding waste activities at alte) (first) Name (last) Phone Number (area code and number) Job Title VI. Installation Contact Address (See Instructions) A. Contact Address B. Street or P.O. Box Mailing Location ZIP Code State City or Town VII. Ownership (See instructions) A. Name of Installation's Legal Owner Street, P.O. Box, or Route Number. State ZIP Code City or Town (Date Changed)
Day Year C. Owner Type D. Change of Owner B. Land Type Month: Indicator Phone Number (area code and number) No

ID - For Official Use Only

WATERBURY, VERMONT 05671-0404 VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.) A. Hazardous Waste Activity B. Used Oil Fuel Activities 1. Generator (See Instructions) 3. Treater, Storer, Disposer (at 1. Off-Specification Used Of Fuel beniuper at firmed A setol/ (notestatent a. Greater than 1000kg/mo (2,200 lbs.) for this activity; see instructions. a. Generator Marketing to Burner b. 100 to 1000 kg/ma (220 - 2,200 lbs.) 4. Hazardous Waste Fuel b. Other Marketer c. Less than 100 kg/mc (220 lbs.) a. Generator Marketing to Burner ti. Bumer - Indicate device(s) -Type of Combustion Device Transporter (Indicate Mode in boxes 1-5 below) b. Other Marketers a. For own waste only o. Boiler and/or Industrial Furnace 1. Utility Boiler b. For commercial purposes 1. Smelter Deferral Industrial Boiler Mode of Transportation 2. Streff Quantity Exemption 3. Industrial Furnace 1. Air Indicate Type of Combustion Device(s) 2 Rail 2. Specification Used Oil Fuel Marketer 1. Utility Boiler (or On-site Burner) Who First Claims the Oil Meels the 3. Highway Industrial Boiler 4. Water Specification 3. Industrial Furnace 5. Other - specify 5. Underground injection Control IX. Description of Regulated Wastes (Use additional sheets if necessary) A. Characteristics of Nonlisted Hazardous Wastes. Mark "X" in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24) 4. Toxacity 1, ignitable 2, Corrosive 3. Resotive Characteristic (D001) (D002) (0003) (0000) (List specific EPA hazardous were number(s) for the Toxicity characteristic contaminare(s): B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.) 1 2 3 4 6 5 7 g 10 8 11 12 Other Wastes, (State or other wastes requiring a handler to have an I.D. number. See instructions.) 1 2 4 5 6 X. Certification I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and Imprisonment for knowing violations. Name and Official Title (type or print) Signature Date Signed XI. Comments Note: Mall completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

In the event of a spill or emergency, contact the National Response Center 1-800-424-8802 and if within Vermont, The Vermont Department of Public Safety 1-800-641-5005.

Appendix D

VERMONT AGENCY OF NATURAL RESOURCES HAZARDOUS MATERIALS MANAGEMENT

103 South Main Street Waterbury, Vermont 05671-0404 802-244-8702

WASTE MANIFEST	* Generator's US EPA ID No		anifest ment No.	2. Page 1 of	require	d by Fed	he shaded area deral law, but	nay
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VERMONT MANUFACTURER, INC.

CONTINGENCY PLAN

GENERAL INFORMATION

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Vermont Manufacturer, Inc Namon

P.O. Box 363, Rt #44 Windsor, VT 05089 Location:

(802) 123-4567 Phone:

COORDINATORS EMERGENCY

Primary:

Office Extension: 1111 05156 Springfield, VT Home Telephone:

Howard S. Bantom Alternate:

Home Telephone: 802-555-1234 Office Extension: 2222 Reading, VT 05062 P.O. Box 90

Alternate:

802-555-2000 Office Extension: 3333 Reading, VT 05062 Home Telephone: Sally Q. Jones

of metal wire into paper clips Type of Facility: Processing

IMPLEMENTATION OF CONTINGENCY PLAN

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This plan will be implemented if an incident threatens human life or the environment. The emergency coordinator has full authority to make this decision. Examples of such incidents are uncontrollable fire or spills, overflows which may or may not be contained within the leaks, or facility.

EMERGENCY RESPONSE PROCEDURE

Notification: Any employee discovering a fire or hazardous release must signal the facility personnel by either verbal or audible means. Telephones located in the mill area or the supervisors' office can be used to contact the Primary Emergency Coordinator.

supervisor is responsible for contacting the Primary Emergency Coordinator (P.E.C.) at his home. In the event that the P.E.C. cannot be reached, an Alternate Emergency Coordinator must be contacted. Their phone numbers are listed in Section 1. emergency occurs during the second or third shift, the shift

must be During any emergency, the P.E.C. and/or Alternate Coordinator(s)

will have the authority to speer course of action can be taken. The P.E.C. will have the authority to speer dwatever is necessary to carry out the contingency plan. During an absence of the P.E.C., the First Alternate Emergency Coordinator will carry out the contingency plan. In his absence, the Second Alternate Emergency Coordinator.

emergency mituation, coordinator is on call) must do the following immediately: Whenever there is an imminent or actual emergency coordinator (or his/her designee

- Activate internal facility alarms or communication systems;
- Notify appropriate state or local agencies with designated response roles if their help is needed; 3
- If a release has occurred, identify the source, character, emount and extent of any released materials by record review or chemical analyeis; 3
- Assess hazards to human health and the environment, considering all direct and indirect effects; Ξ
- If the emergency coordinator determines that the facility has had a fire, explosion or release which could threaten human health or the environment outside the facility, she/he must: 3
- Determine if local evacuation may be necessary, and, if mo, notify appropriate local authorities and be evallable to assist local authorities in evacuation measures; and Ξ
- Notify the National Response Center (800-424-8802) and indicate his/her name and telephone number; name and address of the facility; time and type of incident; quantity of material(s) involved to the extent known; the extent of any injuries; and the possible hazards to human health or the environment outside the facility. (11)
- Take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers; 9
 - If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, wherever this is appropriate; 3
- other material that Immediately after an emergency, the emergency coordinator must provide for treating, storing or disposing of recovered waste, contaminated soil or surface Water, or any other material that results from a release, fire or explosion at the facility; and **E**
- that in the affected areas of the facility, no waste that incompatible with the released material is stored until procedures are completed and all emergency equipment is may be incompatible with the released mater cleanup procedures are completed and all emcleaned and restored to a useable condition. Ensure 6

EVACUATION PLAN

Facility personnel will be evacuated if the Emergency Coordinator decides that their personal selety is in danger. Immediately after the Primary Emergency Coordinator declares the evacuation of the facility the Primary, or First Alternate Coordinator must notify the Firthe Primary, at First Alternate accedinator must notify the Firthe Personal and Hospital. A facility site plan indicating exits in attached.

An evacuation will be announced to employees by the Primary Emergency Coordinator. Routes and alternative routes are as follows:

Employees who may be in the wire bending thickener building would use either the East or West exits depending upon their proximity, and the location of the incident.

NOTIFICATION OF FEDERAL, STATE, AND LOCAL AUTHORITIES

The Emergency Coordinator, after assessing the situation an implementing the contingency plan, will be responsible for th notification of the appropriate agencies listed below, as required.

- A. If threat of damage beyond facility exists: National Response Center, Washington, D.C. Telephone No. 800-424-8802
- . If a spill may endanger ground or surface water:
- Environmental Protection Agency, Lexington, MA Telephone No. 617-223-7265
- C. The Vermont Agency of Environmental Conservation must notified of any event which may result in implementation the contingency plan.

Vermont Agency of Environmental Conservation Telephone No. 802-241-3888 24 Hr. Dispatcher No. 802-828-3100 800-641-5005

-). Windsor Ambulance Service. 674-2112
- . West Windsor Fire Dept. 674-2121

EMERGENCY EQUIPMENT

- A. Telephones are available for outside communications. Telephones are in the Office, mill area, and the laboratory.
- Borbents are located in the wire bending building and in the hazardous waste storage area and should be used to contain liquid releases.

- . A list of fire extinguishers and their location and type is attached.
- D. Water hoses are available in the small hydrant building on the East side of the wire bending building.
- Respirators are available in the warehouse

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CONTINGENCY PLAN DISTRIBUTION

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Copies of this contingency plan have been distributed to:

- A. Windsor Ambulance Service
- West Windsor Fire Department
- : Mt. Ascutney Hospital & Health Center

APPENDIX D
HAZARDOUS WASTE MANIFEST DESIGNATIONS AND SIGNATURE POLICIES

The project manager should insert the training records and the formal written designation and authorization from the Division Commander for those individuals authorized to sign hazardous waste manifests at the project.



Construction Bulletin

No. Issuing Office: Issue Date: Exp. Date: 31 DEC 95

CEMP-C

Subject: Hazardous Waste Manifest Signature Policy and Procedures

Applicability: DIRECTIVE

1. REFERENCES.

- a. Construction Bulletin No. 91-13, 3 Jul 91, subject: Preparation and Signature of Hazardous Waste Manifests and Land Ban Certifications on EPA Superfund Projects.
- b. Construction Bulletin No. 91-21, 27 Nov 91, subject: Signature of Hazardous Waste Manifests for EPA Superfund Projects.
- c. Construction Bulletin No. 92-1, 29 Jan 92, subject: Asbestos Notification and Waste Shipment Record Requirements.
- d. ER 1180-1-6, Construction Quality Management, 1 Apr 91.
- e. ER 1110-1-263, Chemical Data Quality Management for Hazardous Waste Remedial Activities, 1 Oct 90.
- f. CEMP-RT memorandum dated 30 Apr 93, subject: Signatory Responsibility for Hazardous Waste Manifests and Related Documents - Policy Guidance.

purpose.

This Construction Bulletin (CB) establishes policy regarding the signing of hazardous waste manifests and related documents. The Resource Conservation and Recovery Act (RCRA) addresses the "cradle to grave" management of hazardous waste. This includes the generation, storage, treatment, transportation and disposal of hazardous wastes. Implementing regulation (40 CFR 262) requires a generator who transports, or offers for transportation, hazardous waste for offsite treatment, storage, or disposal to prepare and sign a manifest which describes the hazardous waste in detail.

3. GENERAL.

With the exception of Corps owned facilities, USACE is not considered to be the owner of the hazardous waste it transports as part of the response activities. The customer agency is the generator for purposes of executing hazardous waste manifests. However, due to logistic complexities, a customer may not be able to provide an individual to sign the hazardous waste manifests in a timely manner. The customer may then request the Corps to sign project manifests on their behalf. (Federal regulations permit generators to have agents act on their behalf in signing the manifest forms). When an individual is signing on behalf of a generator which is a legal entity, such as a corporation or a company, the words "on behalf of" should be entered to indicate that the person signing the Generator's Certification is not necessarily accepting liability for violating the federal standards.

4. POLICY.

- a. As the leader in DOD's full service environmental restoration efforts, USACE's role is expanding as a result of legislation, evolving missions, and customer needs. Commensurate with this role, it is USACE's goal to develop and implement practices that will facilitate the continuation of quality, comprehensive environmental services. In keeping with this goal, it is USACE's policy, if requested by its customers, to execute on behalf of those customers hazardous waste manifests and related documents. So far, two of our customers have requested USACE assistance in signing manifest forms on their behalf: the Environmental Protection Agency (EPA) and the Farmers Homes Administration. HQUSACE has accepted the delegated responsibility.
- b. With regard to manifesting activities at sites where USACE is the owner or responsible agency, e.g., Civil Works facilities or Defense Environmental Restoration Program (DERP)-FUDS, manifest execution and related responsibilities will be performed by USACE.
- c. With regard to DERP-Installation Restoration (IR) and Base Realignment and Closure (BRAC) environmental restoration activities, manifest execution and related responsibilities ordinarily belong to the customer (i.e., the installation or the base).

In those instances where the additional cost of sending a qualified USACE representative to a remote location for a small project is unwarranted, the option of requiring the contractor to sign the manifests is permitted and should be considered. This option can only be exercised on a project specific basis after written authorization of the customer and approval of the Chief, Construction Division at the executing district. For FUDS projects, only the approval of the Chief, Construction Division at the executing district is necessary. In all cases, this requirement (of having the contractor sign the manifest) must be incorporated in the contract solicitation prior to contract award.

5. PROCEDURES.

Where USACE personnel execute Uniform Hazardous Waste Manifest forms and related documents, procedures will be adopted by the operating divisions or districts as follows:

- a. In the Generator's Name and Mailing Address box (block #3) on the Uniform Hazardous Waste Manifest form, Corps authorized personnel shall enter the following information: "Environmental Protection Agency/Superfund Program", "Farmers Homes Administration", or "DOD" (DERP/FUDS)" as appropriate followed by "c/o" and then the name and address of the Corps office that manages the returned manifest forms. In the generator's certification box (block #16), the Corps employee would then sign his or her name, followed by "USACE" after writing or printing the phrase "On-behalf of the Environmental Protection Agency" or "On behalf-of the Farmers Homes Administration" as appropriate. On FUD sites, Corps personnel should follow the same procedure after typing or printing the phrase "On behalf-of the Department of Defense". All other manifest related documents executed by USACE members on behalf of a customer shall be executed by signature followed by USACE after writing or printing the phrase "on behalf of the (name of the customer)".
- b. On Corps owned facilities where the Corps is a "generator" of hazardous wastes or is the "Responsible Party", Corps personnel shall enter in block #3 on the manifest form "U.S. Army Corps of Engineers", followed by the name and address of the Corps office that manages the returned manifest forms. In the generator's certification

box (block \$16), the Corps authorized employee would sign his or her name after typing or printing the phrase "On behalf of the U.S. Army Corps of Engineers".

- c. Corps personnel authorized to execute manifest forms and related documents shall assure compliance with all reporting requirements (e.g., exceptions reports, biennial reports and state reports) as well as follow-on requirements, including the assembly and retention of all appropriate documentation and certifications.
- d. Assure that USACE is authorized by its customers to execute hazardous waste manifests and related documents on their behalf before such documents are executed. authorization is effected through an explicit provision in a Memorandum of Agreement, Inter-Agency Agreement, or correspondence signed by an appropriate agency official* requesting and authorizing USACE to sign on their behalf. The customer request and authorization must acknowledge that the customer retains all responsibilities for the hazardous waste as a generator. This shall extend to the execution of the Hazardous Waste Manifests, Land Disposal Restriction Notification and Certifications, Waste Profile Sheets, and other forms necessary for the completion of manifests for transportation and disposal of hazardous waste. Approval to undertake the delegated responsibility of signing manifest forms and related documents rests with the chief of Construction Division at the executing district. statutes or regulations do not permit USACE to sign such documents on behalf of the customer, the Resident Engineer (RE) or other designated USACE representative is to contact the customer for further guidance.
- e. All USACE members executing hazardous waste manifests and related documents must receive appropriate training before executing such documents. The minimum required training is specified in the following regulations:

D-4

^{*} HQUSACE Office of Counsel advised that EPA's letter of 18 Oct 90 (see reference la) requesting and authorizing USACE to execute and certify manifest forms and related documents on their behalf is legally sufficient and that no further documentation or individual project authorization is necessary.

- (1) Occupational Safety and Health Act (OSHA), 29 C.F.R. 1910-120;
- (2) Resource Conservation and Recovery Act (RCRA), 40 C.F.R. 264.16 and 40 C.F.R. 265.16;
- (3) Hazardous Transportation Uniform Safety Act (DOT), 49 C.F.R. 173.1; and May 15, 1992 Final Rule, Federal Register 49 C.F.R. 172.700 (Subpart H-Training); and
- (4) Army Regulatory training requirements (AR 55-355).

Additional training may be required by operating divisions or districts. Training can be obtained from within or outside USACE. Regardless of the training source, it is the responsibility of the employing division or district to assure that the training is appropriate and that records of the members' successful completion of the training are appropriately maintained.

- f. Only USACE members formally designated and authorized by a division or district commander/deputy commander shall be allowed to execute hazardous waste manifests and related documents. The formal designation and authorization must be in writing and state that the member is within his/her scope of employment when executing such documents.
- g. Where USACE members are executing hazardous waste manifests and related documents, the contract under which the removal or remediation is being performed must contain supporting chemistry-related requirements and procedures. These items are imposed by the specifications and addressed by the contractor in a document known as the "Chemical Data Acquisition Plan" (see reference le). These plans are site specific guidance for sampling and analyses. They address, among other things, laboratory activities, chemical data documentation, equipment, sampling documentation, quality control, sample custody and shipment, analytical methods and document preparation. The project specific supplement to the QA Plan, developed by the Resident Engineer in accordance with reference 1d, must define the USACE quality assurance role in the manifesting process.

- h. It is intended that future contracts shall contain a requirement that hazardous waste manifests and related documents executed by USACE members be supported by contractor submittals prepared, reviewed, and approved by an authorized representative of the contractor. The authorized representative of the contractor. The contractor's employee shall also certify that packaging, contractor's employee shall also certify the waste meet all labeling, marking and placarding of the waste meet all applicable federal and state regulations, and shall also certify as correct, Land Disposal Restriction Notifications certify as correct, Waste Profile Sheets, and related and Certifications, Waste Profile Sheets, and related documents before providing the documents to USACE.
 - (with MRD MCX support) is defining the responsibility of and the course of action to be followed by all parties involved, the course of action to be followed by all parties and i.e., HTRW design districts, executing districts and contractors. A complete hazardous waste transportation and disposal check list will be developed for contractors to complete as part of the submittal process. For your complete as part of the submittal process. For your information, the Engineer Manual on manifesting is projected to be complete by end of this fiscal year. Previously issued to be complete by end of this fiscal year. Previously issued to be provided you with recommended training sources, Hot lines, and videotape libraries to assist you in accomplishing your mission.
 - This CB has been coordinated with HQUSACE 's Environmental Restoration Division (CEMP-R); Engineering Division (CEMP-E); Office of the Chief Counsel (CECC-C); Office of the Principal Assistant Responsible for Contracting (CEPR-ZA); and, Operations, Construction and Contracting Division, Directorate of Civil Works (CECW-OC).

CHARLES R. SCHROER Chief, Construction Division 30%

CECW-OA

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Hazardous Waste Manifest Signature Policies and Procedures

1. References:

- a. Department of Transportation Regulation 49 CFR 172.700 (Subpart H-Training).
 - b. Construction Bulletin 93-6, subject as above (enclosed).
- 2. It is Civil Works and Military Programs policy with regard to manifesting activities at sites where the U.S. Army Corps of Engineers is the owner or responsible agency, that manifest execution and related responsibilities will be performed by the Corps.
- 3. Department of Transportation regulation 49 CFR 172.700 (Subpart H-Training) requires training employees who load, unload, or handle hazardous materials for transportation, assure the safety of a shipment, or operate a motor vehicle used to transport hazardous materials.
- 4. Construction Bulletin 93-6, paragraph 5e., requires that all Corps members "executing" hazardous waste manifests and related documents must receive appropriate training before executing such documents. Completion of training is required by 1 October 1993, for employees employed on or before 2 July 1993.
- 5. Only Corps members formally designated and authorized by a division or district commander/deputy commander shall be allowed to execute hazardous waste manifests and related documents. The formal designation and authorization must be in writing and state that the member is within his/her scope of employment when executing such documents.

CECW-OA SUBJECT: Hazardous Waste Manifest Signature Policies and Policies

6. Headquarters point of contact is Jim Wolcott (CECW-OA), at (202)272-1152.

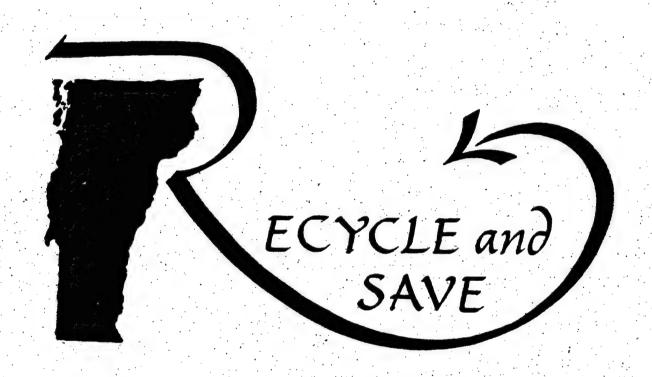
ENCL

JOHN P. FIMORE, P.E. Chief, Operations, Construction, and Readiness Division Directorate of Civil Works

APPENDIX E RECYCLING INFORMATION

Markets and Special Services Directory for Reusable and Recyclable Materials

(Seventh Edition - February 1996)



Vermont Agency of Natural Resources
Department of Environmental Conservation
Environmental Assistance Division
103 South Main Street
Waterbury, VT 05671-0411

1-800-932-7100 (in Vermont) (802) 241-3589

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A. INTRODUCTION

This directory has been prepared to assist community groups, businesses, municipalities and solid waste districts in identifying markets and services for reusable and recyclable materials. While the directory provides some basic information on freight arrangements, and market specifications, it would be best for you to contact each potential market before you attempt to collect or sell any recyclable material. We encourage you to contact a number of companies to compare market arrangements and prices so that you can get the best deal for your facility. The NATIONAL AND STATE ORGANIZATIONS section provides additional information on reuse and recycling markets. You may also want to check on the end-use for the material since that information is not included in this Directory.

The markets guide can help you "Close the Loop" by listing directories with information on recycled content products. We encourage the purchase of recycled paper that is manufactured without the use of chlorine or chlorine derivatives as bleaching agents. For more information on the variety of chlorine-free recycled paper available and where to get samples, and to learn more about buying other recycled products, call the Recycling Hotline.

The directory contains a categorical materials index which lists the state that the business is located in. The categorical materials index will assist you in identifying brokers, processors or end users of a particular material. The profiles of end users, processors, and brokers are listed alphabetically. Refer to the Special Services Section for information on reuse opportunities, other recycling services, recycling directories and organizations, and listings for your local recycling coordinator.

For more information on recycling:

Vermont Recycling Hotline: 1-800-932-7100.

For information on Pollution Prevention:

Vermont Pollution Prevention: 1-800-974-9559

¹ Cover is printed on 100% post-consumer recycled, unbleached paper.

Text is printed on 100% recycled (50% post-consumer), unbleached paper.

B. MATERIALS LISTED IN THIS DIRECTORY

This directory identifies markets for the following recyclable materials:

Aluminum

Aluminum

Batteries

Lead-acid Batteries

C&D

Asphalt

Asphalt Shingles

Brick

C&D

Clean Wood Waste

Concrete

Gypsum

Railroad Ties

Sheet Rock

Stumps

Stumps, other tree parts

Telephone Poles

Compostable Materials

Food Waste

Yard Waste

Gable Top

Gable Top/Drink Boxes

Milk Cartons

Glass

Oil

Other

Pallets

Paper

Blueprints

Boxboard

Brown Grocery Bags

Cardboard

Colored Ledger

Computer Print-out

Cores

Corrugated Cardboard

Hardcover Books

Magazines

Mixed Paper

Paper (cont.)

Newspaper

Other Paper

Telephone Books

Waxed Cardboard

White Ledger

Wirebound Boxes

Plastic

Greenhouse Film

Grocery Sacks

HDPE Plastic Containers

LDPE Plastic

Molded Flower Pots

Mulch Film

Other Plastic

Overwintering Film

PETE Plastic Containers

PP Plastic (polypropylene)

PS Plastic (polystyrene)

PVC Plastic (polyvinylchloride)

Plastic Bags

Plastic Film

Polyurethene

Resins 1 - 7

Shrink Wrap

Silage Bags

Stretch Film

Urethane Foam

Rendering

Grease

Meat and Bone Scraps

Reusable Items

Scrap Metal

White Goods

Steel Cans

Textiles

Clean Clothes

Clean Rags

Tires

C: CATEGORICAL MATERIALS INDEX

Aluminum

Acme Metals and Recycling Inc. (MA)

Advanced Recycling (NH)

Alcoa Recycling Co. Inc. (NJ)

Casella Waste Management (VT)

Chittenden Recycling Services (VT)

Conigliaro Industries Inc. (MA)

Goodman Recycling, Div. of WMI (MA)

Hardwick Recycling and Salvage (VT)

Hodgdon Brothers (VT)

Janci Metal Recycling (NH)

Jewell Resources, Inc. (NH)

Manchester Recycling Corp. (NH)

Northeast Kingdom SWMD (VT)

Northeast Waste Services, LTD (VT)

P. Allen and Son, Inc. (MA)

Pinetree Waste Corp. (NH)

Recycle America/RRT (MA)

Recycling Services (NH)

Reynolds Aluminum Recycling (CT)

Rutland County MRF (VT)

Rutland Storage Trailers Inc. (VT)

Superior Recycling (NH)

Waste Mgt. of Eastern New York (NY)

Windham SWMD (VT)

Batteries

Consolidated Recycling (PO)

Hodgdon Brothers (VT)

Hodgdon Brothers Recycling (VT)

Janci Metal Recycling (NH)

Manchester Recycling Corp. (NH)

Pinetree Waste Corp. (NH)

Recycling Services (NH)

Construction Waste and Demolition Debris (C&D)

A. Marcelino and Company Inc. (VT)

All Cycle Waste Inc. (VT)

American Reclaimation Corp. (MA)

BROX Industries (NH)

BROX Industries (MA)

Chittenden Wood & Yard Waste (VT)

Commercial Paving Systems (ME)

DeCato Sand and Gravel (NH)

Domtar Gypsum (NH)

Environmental Resource Return (NH)

Hardwick Recycling and Salvage (VT)

King Road Materials (NY)

M-R Land Excavation, Inc. (NH)

Pike Industries (NH)

C&D (cont.)

Rutland County MRF (V1)

Rutland Storage Trailers Inc. (VT)

Wood Recycling Inc. (MA)

Compostable Materials

Intervale Foundation (VT)

Gable Top

Casella Waste Management (VT)

Chittenden Recycling Services (VT)

Northeast Kingdom SWMD (VT)

Glass

Anchor Glass Container (CT)

All Cycle Waste Inc. (VT)

Casella Waste Management (VT)

Chittenden Recycling Services (VT)

Conigliaro Industries Inc. (MA)

Consumers Glass (ON)

Fenwick Paper Brokerage (VT)

Foster-Forbes Glass Co. (MA)

Hardwick Recycling and Salvage (VT)

King Road Materials (NY)

Northeast Kingdom SWMD (VT)

Northeast Waste Services, LTD (VT)

Orford Recycling, Inc. (PQ)

Owens-Brockway Glass Inc. (OH)

Pennsylvania Cullet (PA)

Recycle America/RRT (MA)

Recycling Services (NH)

Rutland County MRF (VT)

Rutland Storage Trailers Inc. (VT)

Waste Mgt. of Eastern New York (NY)

Windham SWMD (VT)

Other

American Reclaimation Corp. (MA)

Baker Commodities (VT)

Recycling Services (NH)

Reynolds Aluminum Recycling (CT)

Pallets

All Cycle Waste Inc. (VT)

Dom's Empty Package Supply (NY)

M-R Land Excavation, Inc. (NH)

Pallets Recycle of Vermont (VT)

Rutland County MRF (VT)

Paper

Robert Stuart (VT)

A. Shapiro and Sons (MA)

APC Paper Company (NH)

Acme Metals and Recycling Inc. (MA)

All Cycle Waste Inc. (VT)

American Paper Recycling Co. (VT)

Bonded Insulation Co., Inc. (NY)

Canusa Corporation (VT)

Cascades Recycling Inc. (QUE)

Casella Waste Management (VT)

Chittenden Recycling Services (VT)

Conigliaro Industries Inc. (MA)

Dom's Empty Package Supply (NY)

Domtar Packaging, Recyc. Div. (ON)

Encore Paper (NY)

Fenwick Paper Brokerage (VT)

Fort Orange Paper Co. (NY)

G.E. Robertson & Co. (NH)

Goodman Recycling, Div. of WMI (MA)

Hanna Paper Recycling Co. (MA)

Hardwick Recycling and Salvage (VT)

J. Schwartz Motor Transport. (NH)

Manchester Recycling Corp. (NH)

Marolf Enterprises Inc. (VT)

National Fiber Inc. (MA)

New England Processing (ME)

North Shore Recycled Fiber (MA)

Northeast Kingdom SWMD (VT)

Northeast Waste Services, LTD (VT)

Orford Recycling, Inc. (PQ)

P. Allen and Son, Inc. (MA)

Paper Services Ltd. (NH)

Paperboard Industries Corp. (ON)

Papier Kinsey Fall/Cascade Div (PQ)

Penacook Fiber Company (NH)

Pinetree Waste Corp. (NH)

Pinetree Waste Corp. (NH)

Putney Paper Co., Inc. (VT)

QUNO Corporation (ON)

Recycle America/RRT (MA)

Recycling Services (NH)

Rock-Tenn Company (VT)

Rutland County MRF (VT)

Rutland Storage Trailers Inc. (VT)

Sonoco Limited (PQ)

Sonoco Paper Recovery ()

Specialty Paperboard, Inc. (VT)

St. Laurent Paperboard Inc. (ON)

Strathcona Paper Co. (ON)

Sunoco Products Co. (MA)

Superior Recycling (NH)

Tenneco Packaging (NY)

Paper (cont.)

Thermo-cell Insulation Ltd. (ON)

Waste Mgt. of Eastern New York (NY)

Wellington Hill Recycling Co. (VT)

William Goodman and Sons (MA)

Windham SWMD (VT)

Wood Recycling Inc. (MA)

Plastic

Atlantic Poly Inc. (MA)

Casella Waste Management (VT)

Chittenden Recycling Services (VT)

Conigliaro Industries Inc. (MA)

Enviro Tech (MA)

Fiber Conversion, Inc. (NY)

Free Flow Packaging Corp. (DE)

Gianco Ltd. (NY)

Hafner Industries, Inc. (CT)

Hardwick Recycling and Salvage (VT)

Ingenuity Corporation (VT)

Jalisson Transplastek Inc. (PQ)

KJ Plastics (PA)

Mobil Chemical Company (VA)

Natl. Polystyrene Recycling Co (NJ)

New England Processing (ME)

Niagra Resin and Recycling (NY)

Nicon Plastics, Inc. (NY)

North Shore Recycled Fiber (MA)

Northeast Kingdom SWMD (VT)

Northeast Waste Services, LTD (VT)

Obex Inc. (CT)

Orford Recycling, Inc. (PQ)

P. Allen and Son, Inc. (MA)

Polychem Products Ltd. (OC)

Pure Tech International, Inc. (NY)

Recoverable Resources/R2B2 (NY)

Recycle America/RRT (MA)

Recycling Services (NH)

Rutland County MRF (VT)

Rutland Storage Trailers Inc. (VT)

Shuman Plastics (NY)

St. Jude Polymers Corp. (PA)

Tenneco Packaging (NY)

U.S. Polymers, Inc (MA)

United Resource Recvry-Hancor (VT)

Vermont Republic Industries (VT)

WTE Recycling (NY)

Waste Mgt. of Eastern New York (NY)

Wellington Hill Recycling Co. (VT)

Wellman, Inc. (NJ)

Windham SWMD (VT)

Rendering

Baker Commodities (VT)

Scrap Metal

A. Shapiro and Sons (MA) Acme Metals and Recycling Inc. (MA) Advanced Recycling (NH) All Cycle Waste Inc. (VT) Casella Waste Management (VT) Conigliaro Industries Inc. (MA) Consolidated Recycling (PO) Fenwick Paper Brokerage (VT) Freedman & Son Inc. (NY) Hardwick Recycling and Salvage (VT) Hodgdon Brothers (VT) Hodgdon Brothers Recycling (VT) Janci Metal Recycling (NH) Jewell Resources, Inc. (NH) Manchester Recycling Corp. (NH) Pinetree Waste Corp. (NH) R&R Industries, Inc. (MA) Recycling Services (NH) Rutland Storage Trailers Inc. (VT)

Schiavone Brothers Inc. (MA)

Steel Cans

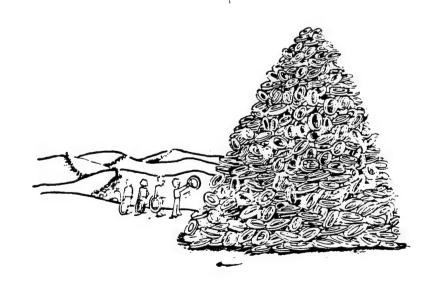
Advanced Recycling (NH) All Cycle Waste Inc. (MA) Casella Waste Management (VT) Chittenden Recycling Services (VT) Conigliaro Industries Inc. (MA) Fenwick Paper Brokerage (VT) Freedman & Son Inc. (NY) Hodgdon Brothers Recycling (VT) Janci Metal Recycling (NH) Jewell Resources, Inc. (NH) Northeast Kingdom SWMD (VT) Northeast Waste Services, LTD (VT) Orford Recycling, Inc. (PQ) P. Allen and Son, Inc. (MA) Recycle America/RRT (MA) Recycling Services (NH) Rutland County MRF (VT) Rutland Storage Trailers Inc. (VT) Waste Mgt. of Eastern New York (NY) Windham SWMD (VT)

Textiles

A. Shapiro and Sons (MA) All Cycle Waste Inc. (VT) Albert E. Silberman & Co., Inc (OH) Casella Waste Management (VT) Chittenden Recycling Services (VT) Copnick Corp. (PO) Cynamon Textile Co. (NY) **Dumont Export Corporation (PA)** E. Butterworth & Co., Inc. (MA) Fenwick Paper Brokerage (VT) Fiber Conversion, Inc. (NY) Josh Trading Co./Sara Glove Co (CT) Northeast Kingdom SWMD (VT) Pinetree Waste Corp. (NH) Rutland County MRF (VT) Sunrise Trading Corp. (NJ) Trans-Americas Trading Co. (NY) WF Trading Company (VT)

Tires

Burlington Tire Removal (VT)
Hodgdon Brothers (VT)
J.P. Routhier and Sons Inc. (MA)
Janci Metal Recycling (NH)
Jewell Resources, Inc. (NH)
Oxford Tire Supply, Inc. (CT)
Palmer Shredding, Inc. (VT)
R&R Industries, Inc. (MA)



D. SOME KEY CONSIDERATIONS WHEN CONTACTING MARKETS

The following considerations are essential when you contact companies about marketing your materials. the following information is vital.

1) Market Specifications

Quality is the most important factor determining the prices you will receive for your materials. In general, the higher the quality - the higher the price you will receive. Each market has purchasing requirements or specifications unique to a particular material. These specifications explain to what extent contaminants are allowed to be mixed with recyclables.

It is important to investigate the specifications of all potential markets before you start collecting materials to determine whether or not you can meet the requirements. As a general rule, it is best to collect your materials with as few contaminants as possible to allow for the widest choice of markets.

Operating procedures at your recycling collection center should incorporate quality control provisions which assure that market specification requirements can be met, (e.g. supervision during operating hours and locked containers during non-operating hours). While higher quality materials receive higher prices, they also require greater quality control provisions and potentially greater collection costs. Quality control provisions minimize the possibility of contaminated loads, i.e. loads that are rejected by your market because they fail to meet minimum specifications. If materials cannot be marketed, they may have to be disposed of as solid waste.

Market specifications can also include requirements on how materials need to be prepared (baled, crushed, loose, etc.) This will determine what processing equipment you may need. These requirements can be very specific, such as different bale sizes and weight limitations for different materials, granulated or shredding sizes for plastics, etc.

2) Contracts

A contract can help to minimize your risks by guaranteeing markets despite fluctuations in market demand. Conversely, a contract will also lock your program into a set price for the contract's duration. Some companies may not offer long-term contracts (one year or more), particularly secondary markets such as brokers or processors. After prospective markets are identified, the next step, if available, is to secure firm commitments from each market in the form of either a letter of intent, a letter of agreement, a contract or a purchase order. Be sure to shop around for the most favorable contractual arrangements.

The following provisions should be considered for inclusion in a market contract:

- (a) Description of material type(s) and grade(s);
- (b) Delivery arrangements, including size (minimum or maximum tonnages) and frequency of shipments;
- (c) Materials specifications guidelines, including acceptable contamination levels and form required;
- (d) Duration of the contract;
- (e) Non-performance penalties (if program fails to deliver tonnage or quality promised in the contract this is to the buyers advantage);
- (f) Price-setting mechanism;
- (g) Services to be provided by the market (transportation, storage);
- (h) Any special terms and conditions.

3) Marketing Services

Certain companies may be willing to provide a variety of services for your program. Some will lease or provide free-of-charge storage containers, while a few others may lease processing equipment, such as balers or compactors. However, the provision of these marketing services is contingent upon the ability of a program to collect large amounts of good quality recyclables on a regular basis.

This directory classifies each company under the categories of broker, processor, or hauler. Brokers may be involved in transporting, storing and handling of materials - and are most likely to provide a variety of services, including container leasing and transportation services. Processors, which are often times brokers as well, prepare materials for delivery to markets, including sorting, baling, crushing and shredding. End-users are companies that use recycled materials to produce a new product, yet may also provide a variety of market services.

Shipping directly to end-use markets may require meeting greater processing requirements and reaching greater tonnage levels, yet end-users often provide a higher price for materials. You may want to consider working through local brokers and processors until you can learn the "ins and outs" of specific markets.

4) Freight

Transportation represents one of the most significant costs in operating a collection facility. A variety of freight arrangements exist and merit consideration in deciding how to get materials to market. This directory usually identifies whether a company accepts materials Free-on -Board (FOB) their dock or the shipper's dock. FOB refers to the point at which transfer of ownership of materials occurs, and consequently, whether you or the buyer will pay the freight costs. For example, "FOB your dock" means the buyer will accept responsibility for the materials at your facility, and the price quoted for materials includes freight costs. Conversely, "FOB their dock" infers that you are responsible for transporting the materials to the market. Some markets are willing to negotiate freight arrangements. For example, some markets may be able to arrange transportation and deduct these costs from the quoted price of the materials.

If a market is able to provide transportation services, they will usually require a minimum load - either prescribed in tonnage or full truck or trailer load.

5) Prices

Prices are not listed in the entries within this directory. Many companies are uncomfortable offering prices over the phone and prefer to do so only in a letter. Prices change often and vary within the markets. Be sure to shop around for the best price.

E. FINAL NOTES

The Department of Environmental Conservation plans to regularly update this directory to reflect changing market situations. We encourage you to keep us updated on your successes as well as problems that you encounter with specific markets, as we are trying to improve market conditions in Vermont.

Please contact the Recycling Section if you have any questions or updated information regarding your marketing operation.

Good Luck!



F. PROFILES OF PROCESSORS, BROKERS AND END-USERS

Contact: Robert Stuart

Address: River Cove Road

Williston

VT 05495

Phone: 802-879-7287

Category: Broker

Freight:

Form: Quantity:

Assistance: Will pick up

Materials Accepted:

Mandcover Books Magazines

A. Marcelino and Company Inc.

- Contact: Alan Marcelino

Address: PO Box 195

Williston

VT 05495

Phone: 800-499-6383

Category: Processor, End-user, Broker

Freight: Form: Quantity:

Assistance:

Materials Accepted:

Asphalt Brick Concrete

A. Shapiro and Sons

Contact: Mr. Shapiro

Address: P.O. Box 711

Phone: 413-663-6525

N. Adams

MA 01247

Category: Broker, Processor

Freight: Pick-up available. Form: prefer baled or boxed

Quantity: truck load

Assistance:

Materials Accepted:

Boxboard

Computer Print-out Corrugated Cardboard

Newspaper White Ledger Scrap Metal White Goods Clean Rags

Textiles

APC Paper Company

Contact: Bud Edwards

Address: P.O. Box 827

Claremont Phone: 603-542-0411

NH 03743

Freight: Form: Quantity:

Category: Processor

Assistance:

Materials Accepted:

Brown Grocery Bags Corrugated Cardboard

Acme Metals and Recycling Inc.

Contact: George Sachs

Address: P.O. Box 3218

Phone: 800-479-3155

Springfield

MA 01101

freight: They can arrange trucking. FOB their dock.

Form: Whole

Quantity:

Assistance: Rent trailers & containers

Category: Broker, Processor

Materials Accepted:

Aluminum

Computer Print-out Corrugated Cardboard

Mixed Paper Other Paper White Ledger Scrap Metal

Advanced Recycling

Contact: Spencer Bennett

Address: 25 Sandquist Street

Concord

NH 03301

Phone: 800-227-3911

Category: Processor

Freight: Form: Quantity: Assistance:

Materials Accepted:

Aluminum Scrap Metal White Goods Steel Cans

Albert E. Silberman & Co., Inc

Contact: Lyn Silbermen Address: 4435 Emery Indst.Pwk

Cleveland

OH 44128

Phone: 216-464-7550

Category: Broker

Freight: Form: Quantity: Assistance:

Materials Accepted:

Textiles

Alcos Recycling Co. Inc.

Contact: Beth Lanning

Address: 1815 Front Street

Scotch Plains

NJ 07076

Phone: 908-322-5588

Category: End-user

Freight: FOB their dock. Can arrange for trucking.

Form: Loose/flat/baled/densifie Quantity: Truckload amt. for pickup Assistance: Can lease equipment

Materials Accepted:

Aluminum

All Cycle Waste Inc.

Contact: Joe Winters

Address: P.O. Box 976, Ave B Williston

VT 05495

Phone: 802-864-6975

Category: Processor

Freight: Trucking available

Form:

Quantity: no minimum

Assistance:

Materials Accepted:

Aluminum

Asphalt, Asphalt Shingles

Brick CED

Clean Wood Waste

Concrete

Gypsum, Sheet Rock

Stumps Pallets Glass

Boxboard Computer Print-out

Colored Ledger Corrugated Cardboard

Magazines Mixed Paper Newspaper White Ledger

Scrap Metal Textiles Steel Cans

Scrap Metal Scrap Metal





American Paper Recycling Co. Category: Broker, Processor Contact: Kevin Gardiner Freight: Free pick-up for 1 or more tons Address: P.O. Box 9481 Form: loose or baled VT 05407 S. Burlington Quantity: Burlington area 1 ton min Assistance: Trailers avail for trailer load amt Phone: 802-863-9109 Materials Accepted: Colored Ledger Computer Print-out Magazines Other Paper White Ledger American Reclaimation Corp. Category: Processor, End-user Contact: Bill McCambridge Freight: Address: PO Box 653 Charlton 01508 Form: Quantity: Assistance: Will recycle on-site Phone: 508-248-3777 Materials Accepted: **Asphalt** Brick Concrete Other Anchor Glass Container Contact: Harry Bautista Category: End-user Address: Route 101, PO 757 Dayville Freight: FOB their plant CT 06241 Form: crushed/roll-offs/trailer Quantity: prefer full truck loads Phone: 203-774-9636 Materials Accepted: Glass Atlantic Poly Inc. Category: Contact: John Maslowski Address: 670 Canton Street Freight: Norwood NA 02062 Form: Baled (850 lb. bales min) Quantity: Min. of 20,000 pounds Phone: 800-225-9892 Assistance: Materials Accepted: Plastic Bags Stretch Film **BROX Industries** Category: Processor, End-user Contact: Erik Stevenson Freight: Address: 85 Greeley Street NH 03051 Hudson Form: Quantity: Phone: 508-454-9105 Assistance:

Materials Accepted:

Asphalt

Concrete

BROX Industries

Contact: Erik Stevenson Address: 1471 Methuen St.

Dracut

Phone: 508-454-9105

MA 01826

Assistance: Materials Accepted:

Asphalt

Stumps, other tree parts

Freight:

Form: Quantity:

Category: Processor, End-user

BROX Industries

Contact: Erik Stevenson

Phone: 508-454-9105

Address:

Milford

Freight: form: Quantity:

Assistance: Other NH site located in Hookset, NH

Materials Accepted:

Asphalt

BROX Industries

Contact: Erik Stevenson

Address:

Marlborough

Phone: 508-454-9105

Category: Processor, End-user

Category: Processor, End-user

Freight: Form:

Quantity:

Assistance: Other MA sites in Ipswich& Merrimac

Materials Accepted:

Asphalt

Baker Commodities

Contact: David King

Address: Avenue-B,Griswald Pk Williston VT

VT 05495

Phone: 802-658-0721

Category: End-user

Freight:

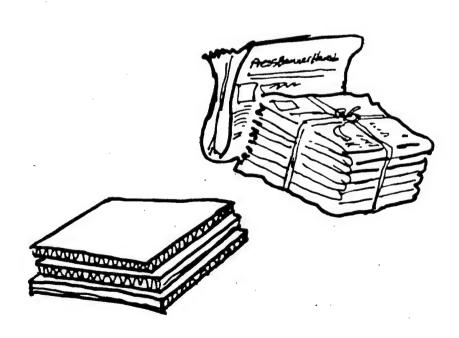
Form: Drums or tanks

Quantity: Assistance:

Materials Accepted:

Other Grease

Neat and Bone Scraps



Bonded Insulation Co., Inc.

Contact: C.D. Chittenden

Address: 78 N. Pawling Street

Hagaman

NY 12086

Phone: 518-842-1470

Category: End-user

Freight:

Form: baled or loose Quantity: 15 - 20 tons/load

Assistance:

Materials Accepted:

Newspaper

Burlington Tire Removal

Contact:

Address: 25 St. Mary Street Burlington

VT 05495

Phone: 802-862-8610

Category:

Freight: Form:

Quantity: Assistance:

Materials Accepted:

Tires

Canusa Corporation

Contact: Dave Knight

Address: P.O. Box 1237 St. Albans

VT 05478

Phone: 802-527-1707

Category: Broker, Processor

Freight: No Pick-up

Form: Baled/loose/gaylords/box

Quantity: no minimum Assistance: baler placement

Materials Accepted:

Boxboard

Colored Ledger

Corrugated Cardboard

Magazines Newspaper Other Paper White Ledger

Cascades Recycling Inc.

Contact: Rina McGuire

Address: 63 St. Josephs Blvd.

Lachine

QUE H85 2K9 Canada

Category: End-user

Freight: FOB their dock. Can arrange trucking.

Form: Baled preferred. Quantity: 20 ton

Phone: 513-363-9118

Assistance:

Materials Accepted:

Colored Ledger Computer Print-out

Cores

Corrugated Cardboard

Newspaper

Telephone Books

White Ledger



Casella Waste Management

Contact: Bob Perry

Address: 175 Lakeside Ave

Burlington

VT 05401

Phone: 802-862-1900

Category: Broker, Processor

Freight: They can pick-up or accept deliveries.

Form: any form

Quentity: no minimum

Assistance: containers leased, education/train

Materials Accepted:

Aluminum

Gable Top/Drink Boxes

Glass Boxboard

Computer Print-out

Corrugated Cardboard Magazines

Mixed Paper Newspaper White Ledger

HDPE Plastic Containers PETE Plastic Containers

PS Plastic Scrap Metal Steel Cans

Textiles

Casella Waste Management

Contact: Tim French

Address: Smith Street **Rutland**

VT 05701

Phone: 802-775-9908

Category: Broker, Processor

Freight: they can pick up or accept deliveries

Form: any form Quantity: no minimum

Assistance: containers leased, education

Materials Accepted:

Aluminum

Gable Top/Drink Boxes

Glass

Computer Print-out Corrugated Cardboard

Mixed Paper Newspaper

White Ledger

HDPE Plastic Containers

PETE Plastic Containers

PS Plastic Scrap Metal

Steel Cans

Textiles

Casella Waste Management

Contact: Lenny Wing

Address: P.O. Box 548

Montpelier

VT 05601

Phone: 802-223-7045

Category: Broker, Processor

Freight: they can pick up or deliver

Form: negotiable Quantity: no minimum

Assistance: containers leased

Materials Accepted:

Aluminum

Gable Top/Drink Boxes

Glass

Computer Print-out

Corrugated Cardboard

Mixed Paper Newspaper

White Ledger

HDPE Plastic Containers PETE Plastic Containers

PS Plastic

Scrap Metal Steel Cans Textiles

Chittenden Recycling Services

Contact: John Hulme

Address: 65 Ave. C

VT 05495

Phone: 802-658-5176

Category: Processor

Freight: Form:

Quantity: Assistance:

Materials Accepted:

Aluminum

Gable Top/Drink Boxes

Glass

Brown Grocery Bags Cardboard Colored Ledger Computer Print-out Hardcover Books Magazines Mixed Paper Newspaper

Telephone Books White Ledger

HDPE Plastic Containers PETE Plastic Containers

PS Plastic Steel Cans Textiles

Chittenden Wood & Yard Waste

Contact: Recycling Hotline

Address:

Burlington

VT 05495

Phone: 802-872-8111

Form: Quantity: Assistance:

Freight:

Materials Accepted:

Clean Wood Waste

Commercial Paving Systems

Contact: Tom Kane

Address: 2 Gibson Road

Scarborough

ME 04074

Phone: 207-883-3325

Category: Processor

Category: Processor

Freight: Form: Quantity:

Assistance:

Materials Accepted:

Asphalt Asphalt Shingles Brick Sheet Rock

Conigliaro Industries Inc.

Contact: Greg Conigliaro Address: 710 Waverly St.

Framingham

Phone: 508-872-9668

MA 01701

Category: Processor

Freight: Can pick-up

Form: Loose/baled/granulated

Quantity: no minimum

Materials Accepted:

Aluminum GLASS

Corrugated Cardboard

Newspaper White Ledger

HDPE Plastic Containers LDPE Plastic

Other Plastic

PETE Plastic Containers

PP Plastic PS Plastic PVC Plastic Plastic Film White Goods Steel Cans

Consolidated Recycling

Contact: Jeff Solomon

Phone: 514-638-1732

Category: Processor

Address: P.O. Box 59

St. Catherine

PQ JOL 1E0 Canada

Freight: Form:

Quantity: Minimum for pick-up

Assistance: On-site baler.

Materials Accepted:

Lead-acid Batteries Scrap Metal White Goods

Consumers Glass

Contact: Joe Paridiso Address: 777 Kipling Ave.

Toronto

ON M8Z 5G6 Canada

Freight:

Form: Uncrushed preferred

Category: Processor

Category: End-user

Phone: 416-232-3603

Quantity: Truck load Assistance: (plants in Montreal & Toronto area)

Materials Accepted:

Glass

Copnick Corp.

Contact: Aivin Berger

Address: 6198 Notre Dame West

Montreal

PO H4C 1V4 Canada

Freight: Form: Quantity:

Phone: 514-937-9306

Assistance:

Materials Accepted:

Textiles

Cynamon Textiles Co.

Contact: Scott Cynamon

Address: Box 716

Hartsdale, NY 10530

Phone: 914-472-4922

Category: Processor

Freight: Over the road and container trucks

Form:

Quantity: 1/2 and full trailer loads

Assistance: Free program set up and development

Materials Accepted:

Textiles-

DeCato Sand and Gravel

Contact: Rodger DeCato Address: Chichester Road

Loudon

NH 03301

Phone: 603-798-5452

Category: Processor, End-user

Freight: Form:

Quantity: Assistance:

Materials Accepted:

Asphalt Brick Concrete

Dom's Empty Package Supply

Contact: Jim or Kay Badami

Address: 87 S. Ohioville Road New Paltz NY 12561

Phone: 914-883-6757

Category: Broker

Freight:

Form:

Quantity: Will pick up trailer load

Assistance: REUSES waxed cardboard, box, baskets

Materials Accepted:

Pallets

Waxed Cardboard Wirebound Boxes Domtar Gypsum

Contact: Jim Jenkins

Address: 122 Old Dover Rd.

Newington

NH 03801

Phone: 603-433-8000

Category: Processor, End user

Freight: No transportation provided Form: CLEAN gypsum drywall only

Quantity: No limits, fees by amount Assistance: Guidelines, fee schedule available

Materials Accepted:

Gypsum

Domtar Packaging, Recyc. Div.

Contact: Norman Evanoff

Address: 66 Shorncliffe Rd. Toronto

ON M8Z 5K1 Canada

Category: End-user, Processor

Freight: FOB your dock. Can arrange trucking. Form: Baled

Category: Processor

Form: Clean and dry clothing

Quantity: Trailer load

Assistance:

Phone: 416-231-2525

Materials Accepted:

Boxboard

Computer Print-out Corrugated Cardboard Mixed Paper

White Ledger

Dumont Export Corporation

Contact: Michael Aronson

Address: PO Box 5549

Philadelphia

PA 19143

Quantity: Assistance:

Freight:

Phone: 215-727-8000

Materials Accepted:

Clean Clothes

Shoes

E. Butterworth & Co., Inc.

Contact: Robert Travis

Address: 1951 Lakeview Ave.

Dracut

MA 01826

Phone: 508-957-3500

Freight: Form:

Quantity: Trailer loads

Category: Processor

Assistance:

Materials Accepted:

Clean Rags Textiles

Encore Paper

Contact: Jeff Davis

Address: 1 River St.

S. Glens Falls

NY 12803

Phone: 518-793-5684

Category: Processor, End-user

Freight: depends

form: baled/gaylords

Quantity: truck load

Assistance:

Materials Accepted:

Boxboard Colored Ledger Computer Print-out

Corrugated Cardboard Magazines Mixed Paper Newspaper White Ledger

Enviro Tech

Contact: Jon Meslowski Address: 670 Canton Street

Morwood

MA 02062

Phone: 617-769-4260

Category: Processor, Broker, End-user

Freight: Can pick up

Form: Loose or baled

Quantity: Assistance:

Materials Accepted:

Plastic Bags Plastic Film

Environmental Resource Return

Contact: Jonathan Mixon Address: 270 Exetor Rd, POB L

- Epping

MH 03042

Phone: 603-679-2626

Category: Processor, End-user

Freight: Form:

Quantity: Assistance:

Materials Accepted:

Asphalt Brick

Clean Wood Waste Concrete Railroad Ties Stumps Telephone Poles

Ferwick Paper Brokerage

Contact: Robert Perrault

Address: PO Box 34, Route 105

Newport Center VT 05857

Phone: 802-334-2492

Category: Broker

Freight: FOB loading dock Form: baled/rolls/gaylords

Quentity: 40,000 lbs for paper Assistance: baler and forklift leasing

Materials Accepted:

Glass

Boxboard Colored Ledger Computer Print-out Corrugated Cardboard

Magazines Mixed Paper Newspaper White Ledger Scrap Metal White Goods Steel Cans Textiles

Fiber Conversion, Inc.

Contact: Nick Terlaak Poot

Address: 15 E. Elm St. Broadalbin

NY 12025

Phone: 518-883-3431

Category: Processor

Freight: Pick up avail. Form: baled

Quantity: unlimited

Assistance:

Materials Accepted:

Urethane Foam Textiles

Fort Orange Paper Co.

Contact: Dan Luizzi

Phone: 518-732-7722

Address: 1900 River Rd.

Castleton-on-Hud. NY 12033

Category: End-user

Freight: FOB their dock.

Form: loose or bales preferred

Quentity: 1/2 ton

Assistance:

Materials Accepted:

Newspaper

Foster-Forbes Glass Co.

Contact: Rick Gallager

Address: National Street

Milford

NA 01757

Phone: 508-478-2500

Freight: You arrange trucking. FOB their dock. Form: crushed or whole

Quantity: truck load preferred

Category: End-user

Assistance:

Materials Accepted:

Glass

Free Flow Packaging Corp.

Contact: Mary C. McLaughlin

Address: 111 Allan Drive

Newark

DE 19711

Phone: 800-888-7310

Freight:

Category: End-user

Category: Processor

Form: Baled, densified **Quantity: Truckload quantities**

Assistance: Accept expanded polystyrene

Materials Accepted:

PS Plastic

Freedman & Son Inc.

Contact: Richard Kent

Address: Tibbetts Ave.

Phone: 518-273-1141

Green Island

NY 12183

Form: Quantity: No Minimum

Freight:

Assistance:

Materials Accepted:

Scrap Metal White Goods Steel Cans

Gianco Ltd.

Contact: Jeff Berger Address: 20 Nancy Street

Phone: 516-491-5800

West Babylon

NY 11704

Category: Broker, Processor

Freight:

form: Loose/baled/granulated

Quantity: no minimum

Assistance:

Materials Accepted:

HDPE Plastic Containers

LDPE Plastic

Other Plastic

PETE Plastic Containers

PP Plastic PS Plastic PVC Plastic Plastic Film

Goodman Recycling, Div. of WMI

Contact: David Goodman Address: 203 Tremont St.

Phone: 413-785-5331

Springfield

MA 01104

Category: Processor

Freight: FOB their dock.

Form: baled

Quantity:

Assistance:

Materials Accepted:

Aluminum Cardboard Colored Ledger Computer Print-out **Mixed Paper** White Ledger

Mafner Industries, Inc.

Contact: Edwin Hafner

Address: Box 3925, Amity Stn.

CT 06525 New Naven

Phone: 203-397-1562

Category: End-user/virgin quality reuseable mater

Freight: FOS their dock. You arrange trucking.

Form: baled, loose or ground

Quantity: open

Assistance:

Materials Accepted:

MDPE Plastic Containers PETE Plastic Containers PVC Plastic

Plastic Film Polyurethene

Hanna Paper Recycling Co.

Contact: Joe Jelson Address: 1150 Rte. 1

Sharon

Phone: 617-784-5155

MA 02067

Quantity: varies

Category:

Assistance: Transport and baling possible

Materials Accepted:

Colored Ledger Other Paper White Ledger

Hardwick Recycling and Salvage

Contact: Serge Dupuis

Address: Route 15

Hardwick

VT 05661

Phone: 802-472-5949

Category: Broker, Processor

Freight: Individual basis

Form: Loose or baled

Freight: Can pick-up or accept deliveries

form:

Quantity: Assistance: Educ. training, roll-off leasing

Materials Accepted:

Aluminum Clean Wood Waste Glass Blueprints

Boxboard Colored Ledger Computer Print-out Corrugated Cardboard

Magazines Newspaper Telaphone Books White Ledger

HDPE Plastic Containers PETE Plastic Containers

PS Plastic Scrap Metal White Goods

Hodgdon Brothers

Contact: Darcy Hodgdon Address: P.O. Box 136

Phone: 802-674-6202

Ascutney

VT 05030

Category: Processor

Freight: Form:

Quentity:

Assistance: landfill pick-ups/roll offs availab

Materials Accepted:

Aluminum Lead-acid Batteries Scrap Metal White Goods Tires

Hodgdon Brothers Recycling

Contact: Porter Hodgdon

Address: Ely St. St. Johnsbury

VT 05819

Phone: 802-748-5422

Category: Broker, Processor

Freight: free pick-up of autos and other scrap metal

Form: as is

Quantity: no min/max

Assistance:

Materials Accepted:

Lead-acid Batteries

Scrap Metal White Goods Steel Cans

Ingenuity Corporation

Contact: T. J. Goetting Address: PO Box 203, North Rd

Barnard

VT 05031

Phone: 802-234-5198

Category: Broker

Freight: FOB source site Form: Baled

Quantity: Nin. 20,000 pounds

Assistance:

: Materials Accepted:

Greenhouse Film Overwintering Film Plastic Film

Intervale Foundation

Contact: Molly Farrell

Address: 282 Intervale Road

Burlington

VT 05401

Phone: 802-660-4949

Category: Processor, End User

Freight: Form: Quantity:

Assistance:

Materials Accepted:

Food Waste Yard Waste

J. P. Routhier and Sons Inc.

Contact:

Address: 256 Ayer Road

01460 Littleton, MA

Phone: 508-772-4251

Category: Processor

Freight: Form: Quantity: Assistance:

Materials Accepted:

Tires

J. Schwartz Motor Transport.

Contact: Mr. Brewer

Address: P.O. Box 4333

Phone: 603-627-4191

Manchester

NH 03108

Category: Broker, Processor

Freight: You arrange trucking. FOB their plant.

Form: Baled or loose

Quantity: Unlimited Assistance: Trailer leasing

Materials Accepted:

Cardboard Colored Ledger Computer Print-out Newspaper White Ledger

Jalisson Transplastek Inc.

Contact: Kevin Greene

Phone: 514-653-1535

Address: 1475 Marie Victorin

St. Bruno

PQ J3V 687 Canada

Category: End-user

Freight: FOB your dock. Can arrange trucking. Form: POST-INDUSTRIAL regrind

Quantity: 20 ton

Assistance: NO POST-CONSUMER

Materials Accepted:

PP Plastic PS Plastic

Janci Metal Recycling

Contact: Fred Janci Jr. Address: P.O. Box 5117

Phone: 603-298-5953

West Lebanon

. NH 03784

Freight: Can be arranged Form: Prepared/unprepared

Quentity: Any

Category: Processor

Assistance: Roll-off boxes; onsite baleing

Materials Accepted:

Aluminum Batteries Scrap Metal White Goods Steel Cans Tires

Jewell Resources, Inc.

Contact: Max Jewell

Address: 2608 Meriden Rd.

Lebanon

NH 03766

Phone: 800-458-4525

Category: Broker, Processor

Freight: Drop-off Ctrs in White River Jct & Lyndonvill

Form: any form

Quantity:

Assistance: baler/crusher/rolloff/hauling

Materials Accepted:

Aluminum Scrap Metal White Goods Steel Cans Tires

Josh Trading Co./Sara Glove Co

Contact: William Pategas

Address: 117 Benedict St.

Waterbury

CT 06722

Phone: 203-574-3137

Category: Processor, Broker

Freight: FOB their Dock

Freight: Form: Quantity:

Assistance:

Materials Accepted:

Textiles

KJ Plastics

Contact: Jim King Address: 48 West Harvey St.

Phone: 215-699-2136

Philadelphia

PA 19144

Form: Baled, min. contamination Quantity: Truckload

Category:

Assistance:

Materials Accepted:

Greenhouse Film HDPE Plastic Containers PETE Plastic Containers Plastic film

King Road Materials .

Contact: Jeff Frani Address: 145 Cordell Road

Schenectady

NY 12303

Phone: 518-382-5353

Category: Processor, End-user

Freight: Form:

Quantity: Assistance:

Materials Accepted:

Asphalt Concrete Glass

M-R Land Excavation, Inc.

Contact: Dan Roy

Address: 29 Scubie Pond Road

Derry

NH 03038

Phone: 603-425-0300

Category: Processor

Freight: Form:

Quantity:

Assistance: Will do on-site chipping

Materials Accepted:

Clean Wood Waste

Stumps Pallets

Manchester Recycling Corp.

Phone: 603-622-8422

Contact: Bob F./Karen Starr

Address: P.O. Box 4387

Manchester

MH 03108

Freight: FOB their dock.

Form: loose or baled

Category: Processor

Quantity:

Assistance:

Materials Accepted:

Aluminum

Lead-acid Batteries

Boxboard

Colored Ledger Computer Print-out Corrugated Cardboard

Magazines Newspaper

White Ledger Scrap Metal

Marolf Enterprises Inc.

Contact: Alan Marolf

Address: 139 Main Street, 606

Brattleboro

VT 05301

Phone: 802-257-0151

Category: Broker

Freight: form:

Quantity: Assistance:

Materials Accepted:

Boxboard

Computer Print-out Corrugated Cardboard

Magazines Other Paper White Ledger

McGoldrick Paper Company

Contact: Bob McGoldrick

Address: 28 Canal St, POB 25

Hinsdale Phone: 603-336-5079 NH 03451

Category: End-user

Freight:

Form:

Assistance: Pick-up large loads

Materials Accepted:

Colored Ledger Computer Print-out Magazines

Mixed Paper Newspaper White Ledger **Nobil Chamical Company**

Contact: David Chapuis

Address: 158 Capital Lane

Winchester

VA 22602

Freight: Variable Form: Baled

Category: Processor, End-user

Quentity: Truckload

Assistance:

Phone: 800-742-1035

Materials Accepted:

Grocery Sacks Plastic Film Stretch Film

National Fiber Inc.

Contact: Mr. Skee Fusco Address: 3 Depot St.

Belchertown

MA D1007

Phone: 413-283-8747

Category: End-user

Freight: Form:

Quantity:

Assistance: Hauling services.

Materials Accepted:

Newspaper

Natl. Polystyrene Recycling Co

Contact: Peter Riemschneider

Address: P.O. Box 338

Bridgeport

NJ 08014

Phone: 609-467-9377

Category: End-user

Freight:

Form: Quantity:

Assistance: call 609-467-9377 ext. 19

Materials Accepted:

PS Plastic

New England Processing

Contact: Ed Betit

Phone: 207-582-6361

Address: P.O. Box 495 Hallowell.

ME 04359

Category: Processor

Freight: FOB their dock

Form: Gaylords/beled/begged

Quantity:

Assistance:

Materials Accepted:

Colored Ledger Computer Print-out Corrugated Cardboard Hardcover Books Magazines Mixed Paper Newspaper

White Ladger HDPE Plastic Containers

Other Plastic PP Plastic PS Plastic PVC Plastic Plastic Film

Niagra Resin and Recycling

Contact: Michael Hagan

Address: 4870 Packard Rd

Phone: 716-282-0235

Miagara Falls

14304

Category: Processor, End-user

Freight: Variable

Form: Baled, Gaylords Quantity: no minimum

Assistance:

Materials Accepted:

LDPE Plastic PP Plastic

Nicon Plastics, Inc.

Contact: Leslie Miller

Address: 4-11 47th Ave.

Long Island City

Phone: 718-392-1177

MY 11101

Form: baled Quantity: trailer load

Category: Reprocessor

Materials Accepted:

PETE Plastic Containers

North Shore Recycled Fiber

Contact: Jonathan Gold

Address: 53 Jefferson Ave.

Salen Phone: 508-744-4330

NA 01970

Freight: FOB sellers dock. Form: Baled or loose

Category: Broker, End-user

· Quantity:

Assistance: Pick-up/trailers/forklift available

Freight: FOB their dock. Can arrange trucking.

Materials Accepted:

Boxboard Colored Ledger Computer Print-out Corrugated Cardboard

Mixed Paper Newspaper Other Paper White Ledger

HDPE Plastic Containers PETE Plastic Containers

Northeast Kingdom SUMD

Contact: Irene Sawyer

Address: 0.0. Box 1075

Lyndonville

VT 05851

Phone: 802-626-3532

Category: Processor

Freight: Form: Quantity:

Assistance:

Materials Accepted:

Aluminum

Gable Top/Drink Boxes

Glass

Boxboard

Brown Grocery Bags Corrugated Cardboard

Magazines Mixed Paper Newspaper Telephone Books White Ledger

HDPE Plastic Containers PETE Plastic Containers

Steel Cans Textiles

Northeast Waste Services, LTD

Contact: Pat Stetson Address: P.O. Box 1045

White River Jct. VT 05001

Phone: 802-295-2660

Category: Processor

Freight: FOB depends on dealer

Form: prefer bales/accept loose

Quantity: no minimum

Assistance: containers/hauling/planning/educate

Materials Accepted:

Aluminum Glass Boxboard

Computer Print-out Corrugated Cardboard

Magazines **Mixed Paper**

Newspaper White Ledger

HDPE Plastic Containers PETE Plastic Containers

PS Plastic Steel Cans

Obex Inc.

Contact: Celeste Johnson

Address: PO Box 1253

Stamford

CT 06904

Category: End-user

Freight: FOB

Form: flexible Quantity: flexible

Assistance:

Phone: 203-975-9094

Materials Accepted:

Plastic Film Resins 1 - 7

Orford Recycling, Inc. Contact: Robert Parenteau

Address: 1100 Talbot Street

Phone: 819-564-6004

Sherbrooke

PQ J1G 2P2 Canada

Category: Broker, Processor, End-user Freight: Can arrange trucking

Form: baled

Quantity: 20 tons

Assistance: plants: Montreal, Sherbrook

Materials Accepted:

Glass

Colored Ledger Computer Print-out Corrugated Cardboard

Newspaper White Ledger Plastic Containers

Steel Cans

Owens-Brockway Glass Inc.

Contact: Patti Hauser

Address: 25 One Seagate

Toledo Phone: 419-247-1199 DH 43666

Category: End-user

Freight: You arrange trucking.

Form: whole or crushed Quantity: truck load

Assistance:

Materials Accepted:

GLASS

Oxford Tire Supply, Inc.

Contact: Jim Madden Address: 1414 Norwich Rd.

Phone: 800-873-8473

Plainfield

CT 06374

Category: End-user

Freight: Included in price quote; provides shipping form: whole, all sizes, rims ok

Quantity: trailer load

Assistance: trailer rentals

Materials Accepted:

Tires

P. Allen and Son, Inc.

Contact: Edward Allen Address: P.O. Box 27

Phone: 413-584-3040

Northhampton

MA 01060

Category: Broker, Processor

Freight: Can arrange for trucking.

Form: loose or baled Quantity: truck load

Assistance:

Naterials Accepted:

Aluminum Cardboard Colored Ledger Computer Print-out Mixed Paper

Newspaper White Ledger

HOPE Plastic Containers

Steel Cans

Pallets Recycle of Vermont

Contact: Dave Blanchette

Address: PO Box 119

Williston

VT 05495

Phone: 802-878-8040

Category: End-user & selling

freight:

Form:

Quantity: delivered in truckloads

Assistance:

Materials Accepted:

Pallets

Palmer Shredding, Inc.

Contact: Nathan B. Palmer

Address: PO Box 179

North Ferrisburg

VT 05473

Phone: 802-425-4031

Category: Processor, End-user

Freight: pick up available

Form: car w/ rims; truck w/o Quantity: call for volume pricing

Assistance: set up trailers for collection

Materials Accepted:

Tires

Paper Services Ltd.

Contact: Gary O'Neal

Address: P.O. Box 45

Hinsdale

NH 03451

Phone: 603-239-6344

Category: Processor, End-user

Freight: FOB their dock Form: Bales/carboys

Quantity: No minimum

Assistance:

Materials Accepted:

Colored Ledger Computer Print-out Magazines Mixed Paper Newspaper

White Ledger

Paperboard Industries Corp.

Contact: Fatima Camara

Address: 495 Commissioners St

Toronto

ON M4M 1A5 Canada

Category: End-user

Freight: Can arrange trucking.

- Form: Baled Quantity: 20 tons

Phone: 416-461-8261

Assistance:

Materials Accepted:

Boxboard

Corrugated Cardboard

Newspaper Other Paper

Papier Kinsey Fall/Cascade Div

Contact: Avery Perkins

Address: 408 Rue Marie-Victir

Kinsey Falls

PQ JOA IBA Canada

Category: End-user

Freight: Form:

Quantity:

Assistance:

Phone: 819-363-5206

Materials Accepted:

Boxboard

Cores

Corrugated Cardboard

Mixed Paper Newspaper

Telephone Books

Penacook Fiber Company

Contact: Rick Allen

Address: 12 N. Main St.

Phone: 603-753-6521

Penacook

MH 03303

Freight: You pay freight. Form: Baled only Quantity: 5 ton

Category: End-user

Assistance:

Materials Accepted:

Corrugated Cardboard

Pennsylvania Cullet

Contact: Gerald Brocious

Address: P.O. Box 247 Corsica

PA 15829

Phone: 814-379-3271

Category: End-user

Freight: truck or rail delivery

Form:

Quantity: Assistance:

Materials Accepted:

Glass

Pike Industries

Contact: Ron Miller

Address: Plainfield Rd Bx 365

West Lebanon **NH 03784**

Phone: 603-298-8773

Category: End-user

Freight:

Form:

Materials Accepted:

Asphalt

Pinetree Waste Corp.

Contact: Maurice Boutin

Address: P.O. Box 402

Keene Phone: 603-357-4586 NH 03431

Freight: Pick-up of materials available

Form: loose or baled

Quantity: no minimum

Category: Processor

Assistance: distribute baling mach/drum crusher

Materials Accepted:

Aluminum

Lead-acid Batteries

Boxboard

Computer Print-out Corrugated Cardboard

Newspaper

White Ledger Scrap Metal Textiles

Polychem Products Ltd.

Contact: Ron Paquette

Phone: 514-348-7392

Address: 725 Gaudette Street

St-Jean-Sur-Richel QC J3B 7S7 Canada

Category: Processor

Freight: Variable

Form: Baled (post-cons. bottles

Quentity: Truckload

Assistance:

Materials Accepted:

HDPE Plastic Containers

LDPE Plastic PETE Plastic Containers

PP Plastic PS Plastic

Pure Tech International, Inc.

Contact: Enrico Gallo

Address: 91 E. Carmans Road

NY 11735 E. Farmingdale

Phone: 516-694-0142

Category: Processor

Freight: contract carriers

form:

Quantity: minimum 40,000lbs

Assistance:

Naterials Accepted;

PETE Plastic Containers

Putney Paper Co., Inc.

Contact: Buddy Edwards Address: P.O. Box 226

Putney

Phone: 802-387-5571

VT 05346

Freight: F.O.B. depends

Form: baled

Category: End-user

Quantity: trailer load

Assistance: Pick-up available

Materials Accepted:

Computer Print-out

Corrugated Cardboard Magazines

Other Paper White Ledger

QUND Corporation

Contact: D. W. Schmaltz

Address: Allenburg Road

Thorold

ON L2V 325 Canada

Freight:

Form:

Category: End-user

Quantity: . Assistance:

Phone: 905-227-1121

Materials Accepted:

Magazines Newspaper

R&R Industries, Inc.

Contact: Hyman Robinovitz

Phone: 413-733-2118

Address: 195 Rocus St.

Springfield

MA 01104

Freight: FOB their dock Form:

Category: Broker, Processor

Quantity:

Assistance: Containers and bucket loaders avail

Materials Accepted:

Scrap Metal White Goods Tires

Recoverable Resources/R2B2

Contact: David Hurd

Address: 1809 Carter Ave.

Bronx Phone: 718-731-3931 NY 10457

Category: Processor

Freight: FOB their dock or pick-up

Form: whole, baled or reground Quantity: no minimum

Assistance:

Materials Accepted:

HDPE Plastic Containers PETE Plastic Containers

PVC Plastic

Recycle America/RRT

Contact: Todd Petrocelli

Address: 12 Elizabeth Drive

Chelmsford

NA 01824

Phone: 508-250-4850

Category: Broker, Processor

Freight: Varies

Form: Baled or loose

Quantity: variable - no minimum

Assistance: Pick-up and hauling, varies

Materials Accepted:

Aluminum Glass Boxboard

Corrugated Cardboard

Hixed Paper Newspaper

HDPE Plastic Containers PETE Plastic Containers

Steel Cans

Recycling Services

Contact: Jim Silvers

Address: Indstri Blvd/P08305

NH 03743 Claremont

Phone: 603-542-8755

Category: Broker, Processor

Freight: FOB delivered or point of pick-up

Form: baled or toose Quantity: truck load

Assistance: Scrap metal baling; rolloff lease

Naterials Accepted:

Aluminum

Lead-acid Batteries

Giass Other

Colored Ledger Computer Print-out

Corrugated Cardboard

Magazines Newspaper

White Ledger HDPE Plastic Containers

Overwintering Film

PETE Plastic Containers PVC Plastic

Shrink Wrap Stretch Film

Scrap Metal Steel Cans

Reynolds Aluminum Recycling

Contact: Stu Marvin Address: 110 Halycon Drive

Bristol

CT 06010

Phone: 203-582-5179

Category: End-user

Freight: Can provide pick-up.

Form: flattened/baled/biscuits

Quantity: no minimum for delivered

Assistance: Trailer & flattener/blower loaned

Materials Accepted:

Atuminum

Rock-Tenn Company

Contact: Thomas Pepple

Address: PO Bx 465/21 Mill St

VT 05485 Sheldon Springs

Phone: 802-933-5903

Category: End-user

Freight: arrange to have mtls. picked-up from broker

Form: baled

Quantity: truck load

Assistance: .

Materials Accepted:

Boxboard Colored Ledger Corrugated Cardboard Mixed Paper

Newspaper White Ledger



Rutland County MRF

Contact: Tim French Address: Green Hill Lane

Rutland

VT 05701

Phone: 802-770-1330

Category: Processor

Freight: Form: Quantity: Assistance:

Materials Accepted:

Aluminum Brick

Clean Wood Waste

Gless Pallets Boxboard

Brown Grocery Bags Corrugated Cardboard Hardcover Books Magazines Mixed Paper

Newspaper Telephone Books White Ledger

HDPE Plastic Containers PETE Plastic Containers

PS Plastic Steel Cans Textiles

Rutland Storage Trailers Inc.

Contact: Kevin & Jeff Elnicki Address: P.O. Box 609

W. Rutland

VT 05777

Phone: 802-775-5568

Category: Processor

Freight: FOB your dock

Form: loose or baled Quantity: 1,000 pounds

Assistance: Provide roll-offs and toters

Materials Accepted:

Aluminum CLD Glass Boxboard Colored Ledger Computer Print-out Corrugated Cardboard Hardcover Books Nagazines Mixed Paper

Newspaper Other Paper Telephone Books White Ledger

HDPE Plastic Containers PETE Plastic Containers

Scrap Metal White Goods Steel Cans

Schiavone Brothers Inc.

Contact:

Address: 16 Maguire Court

Newton

MA 02160

Phone: 617-332-9074

Category:

Freight:

Form: Quantity:

Assistance:

Materials Accepted:

Scrap Metal

Shuman Plastics

Contact: Ken Shumen

Address: 35 Neoga St.

Depew

Phone: 716-685-2121

MY 14043

Category: End-user

Freight: They can arrange trucking. FOB depends.

Form: clean, baled/ground/whole

Quantity: 5 ton or more

Assistance:

. Materials Accepted:

MDPE Plastic Containers PETE Plastic Containers

PP Plastic PS Plastic PVC Plastic

Sonoco Limited

Contact: G.P. Poliquin

Address: 25 Langlois St.

Terrbonne

PQ J6W 4H4 Canada

Category: End-user

Freight: FOB their dock. Can arrange trucking.

Form: baled Quantity: truckload

Assistance:

Phone: 514-471-4153

Materials Accepted:

Corrugated Cardboard Newspaper

Sonoco Paper Recovery

Contact:

Address:

Phone:

Category:

Freight: Form: Quantity: Assistance:

Materials Accepted:

Corrugated Cardboard Mixed Paper Newspaper

Specialty Paperboard, Inc.

Contact: John Caswell

Address: P.O. Box 498

Brattleboro

VT 05302

Category: End-user

Freight: All delivered prices

Form: baled

Quantity: 20 ton minimum

Assistance:

Phone: 802-257-0365

Materials Accepted:

Computer Print-out White Ledger

St. Jude Polymers Corp.

Contact: John Guers

Address: 1 Industrial Park

PA 17931 Frackville

Phone: 717-874-1220

Category: End-user

Freight: FOB your dock.

form: baled, ground or shredded Quantity: 25,000 lb.

Assistance:

Materials Accepted:

HDPE Plastic Containers PETE Plastic Containers

St. Laurent Paperboard Inc.

Contact: Michael Quinn

Address: 1193 North Serv Rd W

Oakville

ON L6M 2V8 Canada

Category: End-user

Freight:

Form: Baled

Quantity:

Assistance: Will pick up

Phone: 905-876-7402

Materials Accepted:

Corrugated Cardboard

Strathcona Paper Co.

Contact: Leo Giroux Address: Box 130

Napanee

ON K7R 3L6 Canada

Category: End-user

Freight: You arrange trucking.

Form: Baled only

Quantity: 20 tons Phone: 613-378-6672

Assistance: (located near Kingston)

Materials Accepted:

Computer Print-out

Sunoco Products Co.

Contact: Randy Michalak

Address: 2 Sargeant Street

Holvoke Phone: 413-536-4546 MA 01040

Category: Broker, Processor

Freight: FOB their dock. You arrange trucking.

Form: Bundled

Quantity: truck load

Assistance:

Materials Accepted:

Cardboard Magazines Newspaper

Sunrise Trading Corp.

Contact: Jacob Yazejian

Address: Hope & King Streets

Jersey City

NJ 07307

Phone: 201-795-1747

Category: Broker, Processor

Freight: Form: Quantity:

Assistance:

Materials Accepted:

Textiles

Superior Recycling

Contact: Bill Gallagher

Address: HCR Box 110A

Cornish

NH 05745

Freight: Form: Quantity:

Category: Processor

Phone: 603-675-2112

* Assistance: containers and pick-up service

Materials Accepted:

Aluminum

Boxboard

Computer Print-out Corrugated Cardboard

Newspaper White Ledger

Tenneco Packaging

Contact: Larry Bettenhausen Address: 1159 Pittsford-Victo

Pittsford

NY 14534

Phone: 716-248-1768

Category: Processor, End-user

Freight: Form:

Quantity: Assistance:

Materials Accepted:

Grocery Sacks Plastic Film Stretch Film

Tenneco Packaging

Address: 74 Weed Street

Phone: 518-561-4880

Plattsburgh

NY 12901

Contact: Leon Aumell

Category: End-user

Freight: Can arrange delivery. FOB their dock.

Form: baled preferred

Quantity: no minimum Assistance: Uncoated paper

Materials Accepted:

Computer Print-out Newspaper

Thermo-cell Insulation Ltd.

Contact: Bob Bossi

Address: 2015 Lanthier Drive

Orleans ON K4A 3V2 Canada

Freight: Will pay freight. Form: Baled preferred
Quantity: Truck load
Assistance: located in Ottawa

Category: End-user

Phone: 613-837-9797

Materials Accepted: '

Newspaper

Trans-Americas Trading Co.

Contact: Edward Stubin

Address: 116-122 West Street

Brooklyn

MY 11222

Phone: 718-383-3445

Category: Broker, Processor

Freight: Form: Quantity:

Assistance:

Materials Accepted:

Textiles

U.S. Polymers, Inc

Contact: Randolph Haight

Phone: 617-593-1414

Address: 220 Broadway N303

Lynnfield

MA 01940

Category: Broker Freight: Pick up or FOB

Form: Baled

Quantity: Truckload or 20,000 lbs

Assistance:

Materials Accepted:

Greenhouse Film

MDPE Plastic Containers

LDPE Plastic

Molded Flower Pots Other Plastic

Overwintering Film PETE Plastic Containers

PP Plastic

PS Plastic

PVC Plastic Plastic Film

Plastics

United Resource Recvry-Hancor

Contact: Dave Markie

Address: 30 Precision Drive

VT 05150 N. Springfield

Phone: 802-886-8403

Category: End-user

Freight: They absorb freight; will arrange pick-up.

Form: CLEAN HOPE FLAKE REGRIND

Quantity: large loads preferred

Assistance:

Materials Accepted:

MDPE Plastic Containers

Vermont Republic Industries

Contact: Albin Voegele

Address: 3 Lemnah Dr. Box 628

St. Albans VT 05478

Phone: 802-524-6055

Category: Broker, Processor

Freight: Can arrange transport. Form: Loose & industrial

Guentity: No minimum

Assistance: Commercial sources only.

Materials Accepted:

HDPE Plastic Containers

PVC Plastic

WF Trading Company

Contact: Wendell Farrell

Address: PO Box 52

Jerico

VT 05465

Phone: 802-899-2361

Category: Broker, Processor

Freight: Form:

Quantity:

Assistance:

Materials Accepted:

Textiles

WTE Recycling

* Contact: Paul Zordan

Address: 136 C. Fuller Road

Albany

NY 12205

Phone: 518-459-1080

Category: Processor

Freight: negotiated Form: Trailers/bulk

Quantity: Full truckloads

Assistance:

Materials Accepted:

PETE Plastic Containers

Waste Mgt. of Eastern New York

Contact: Clayton Roaman

Address: 12 Wing Street

Fort Edward

NY 12828

Phone: 518-747-4688

Category: Processor, Broker

Freight: depends '

Form: baled & loose

Quantity: no min

Assistance: help w/ office recycling

Materials Accepted:

Aluminum Glass Boxboard

Colored Ledger Computer Print-out Corrugated Cardboard

Mixed Paper Newspaper White Ledger

HDPE Plastic Containers PETE Plastic Containers

Steel Cans

Wellington Hill Recycling Co.

Contact: George James Address: Box 424 RFD#3

Putney

VT 05346

Phone: 802-463-1417

Category: Broker, Processor

Freight:

Form: Loose OK

Quantity:

Assistance: Will pick-up and bale.

Materials Accepted:

Computer Print-out

Mixed Paper

White Ledger

HDPE Plastic Containers

PETE Plastic Containers

Wellman, Inc.

Contact: Harry Benson Address: 1040 Broad St/Ste302

Shrewsbury

NJ 07702

Phone: 908-935-7308 ·

Category: End-user

Freight: FOB at shipping point.

Form: baled (app. 700 lbs.) Quantity: minimum 30,000 lbs

Assistance: Trucks available for pick-ups.

Materials Accepted:

PETE Plastic Containers

Wellman, Inc.

Contact: Sue Hunter

Address: PO Box 313

Bridgeport

NJ 08014

Phone: 609-241-8009

Category: End-user

Freight: FOB at shipping point.

Form: Baled only

Quantity: minimum 30,000 lbs

Assistance:

Materials Accepted:

PETE Plastic Containers

William Goodman and Sons

Contact:

Address: 2431 Boston Road

Willbraham

MA 01095

Phone: 413-568-4500

Category: Broker, Processor

Freight: Can arrange trucking.

Form: Baled preferred

Quantity: 15-20/ton

Assistance: Lease and sell balers/compactors

Materials Accepted: .

Cardboard

Computer Print-out

Mixed Paper Newspaper Other Paper White Ledger

Windham SUMD

Contact: Jame Southworth Address: 327 Old Ferry Road

Brattleboro

VT 05301

Phone: 802-258-2645

Category: Processor

Freight:

Form:

Quentity: No minimum quantity

Assistance: Drop-offs avail. throughout distric

Materials Accepted:

Aluminum Glass Boxboard

Corrugated Cardboard

Magazines Mixed Paper Newspaper

HDPE Plastic Containers PETE Plastic Containers

Steel Cans

Wood Recycling Inc.

Contact: James McElvenney

Address: 3 Wheeling Avenue

Woburn

MA 01801

Phone: 800-982-8732

Category: Processor, End-user

Freight:

Form:

Quentity: any amount Assistance: will haul in 100cy trailers

Materials Accepted:

Clean Wood Waste Newspaper Telephone Books



G: REUSE OPPORTUNITIES

1. Vermont Business Materials Exchange:

Don't pay to throw it away!

Material exchanges provide businesses with an opportunity to reuse waste materials. Vermont companies are saving on disposal fees by listing their wastes with the *Vermont Business Materials Exchange* rather than sending them to the landfill. You too, can save money through this state-funded program. There is no charge to use this service. Here are some of the materials that have been listed on the exchange. To list your own wastes, or if you would like a full list of currently available or wanted materials, call the VBMeX at 1-800-895-1930.

Available Materials:

Polystyrene plastic spools Textiles of all kinds Crushed concrete Metal boxes Scrap wood Orange rinds Virgin freon Wooden dowels Plastic buckets
Nylon fabric scrap
Wooden pallets
Corrugated cartons
Disposable gloves
Film containers
HDPE pails
Steel drums
Shredded paper
Bubble packaging bags

Wood chips 9 volt batteries Fiberglass matt Burlap bags Gift boxes

Wanted Materials:

Packaging peanuts
Boxes
Printer ribbons/cartridges
Used clothing

To request a full listing of reusable commercial and industrial wastes, or to list one of your company's wastes, call 1-800-895-1930.



Finding New Uses for Vermont's Commercial and Industrial Wastes

2. National Waste Exchange:

National Materials Exchange Network 522 North Washington Street, Suite 202 Spokane, WA 99201 (509) 325-0507

3. Salvage Yards and Reuse Centers: (starting with Vermont listings)

Organization: Architechural Salvage Warehouse

Contact Person: David Ackerman Address: 212 Battery Street

> Town: Burlington 05401

Phone Number: 802-658-5011

Organization: Mason Brothers Salvage

Contact Person: David Mason Address: 11 Maple Street

> 05452 Town: Essex Junction

Phone Number: 802-879-4221

Organization: Second Harvest - Salvage & Demotition

Contact Person: John Wilson Address: RR #1, Box 194 E

Town: Jeffersonville

Phone Number: 802-644-8169

Organization: Vermont Goods Exchange

Contact Person: Nate Williams Address: P.O. Box 601

Town: Arlington

Phone Number: 802-375-9383

Organization: Vermont Salvage Exchange

Contact Person:

Address: Box 453

Town: White River Ict. VT 050001

Phone Number: 802-295-7616

Organization: DORP Salvage Co. Inc.

Contact Person:

Address:: 566 Broadway

12305 Town: Schenectady

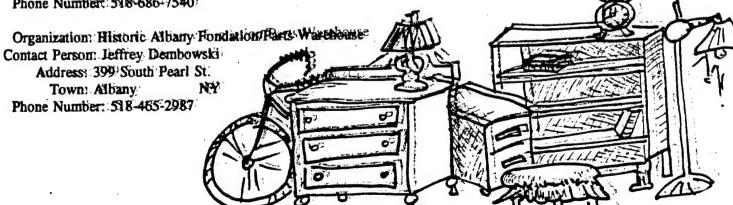
Phone Number: 518-393-1744

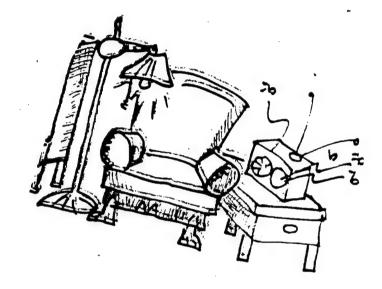
Organization: East Rensselaer County's Community Warehouse

Contact Person: Audrey Harriott Address: 21428 NY 22

> 1220900 Town: Hoosick Falls

Phone Number: 518-686-7540)





4. Computer Reuse: (New England companies are listed first)

Boston Computer Society 101 First Ave, Suite 2 Waltham MA 02154; 617-290-5700 (PC's/IBM 286+, Apple, Macs)

Computer Exchange Taft Corner Shopping Center Williston VT 05495; 802-879-3433

East West Foundation 23 Drydock Avenue, 3rd Floor Boston MA 02210; 617-261-6699 (non-profit computer exchange)

Gifts In Kind 700 N. Fairfax St., Suite 300 Alexandria VA 22314; 703-836-2121 (non-profit/distribute to schools)

Micro Mechanics 4175 Sodom Road Milton VT 05468; 800-639-8126 (monitors only, no monochrome)

Natl. Cristina Foundation 591 W. Putnam Rd. Greenwich CT 06830; 800-274-7846 (< 10 years old, no dumb terminals)

Tecnotes PO Box 1589 Sag Harbor NY 11963; 516-725-2006 (circuit boards only)

VT Assistive Tech. Recyc. Proj 23 Pleasant Street Springfield VT 05156; 800-491-6840 (publish catalogue)

5. Computer Reuse and Recycling: (New England companies are listed first)

C.E.C. Enterprises 110 Middlesex St. North Chelmsford MA 01863; 508-251-0373

Computers Plus 338 Dorset Street S. Burlington VT 05403; 802-863-5633

Digital Equipment Co. 932 Maple Street Contoocook NH 03229; 603-746-8227 (computer and kindred electronics)

EPAinc: Electronics Processing Assoc Inc 1A Foundry Street Lowell MA 01852; 508-970-2700

GeoSoft: The Company PO Box 643 Bellows Falls VT 05101; 603-756-4245

MKR Data Resources 186 Harris Road Nashua NH 03062; 603-888-8015

RST Computer Services 66B River Road Hudson NH 03051; 603-595-8708

Ribbon Recyclers 28 Commerce Street, Unit 3, PO Box 878 Williston VT 05495; 802-660-8960

WA Technology 15 Keewaydin Drive Salem NH 03079; 603-890-4040

Advanced Recovery Inc. 3 Montgomery Street Bellville NJ 07109; 201-450-9797

Envirocycle, Inc. PO Box 899 Hallstead PA 18822; 717-879-2862

Equipment Recycling Services 4641 Pell Drive, Unit #9 Sacremento CA 95838; 800-258-0070

Texas Recycling & Refining, Inc. 1920 Rankin Road Houston TX 77073; 713-443-3973 (electronics)

Tryonics 8 Merrill Industrial Drive Hampton NH 03842; 603-926-1122

6. Laser Toner Printer Cartridges:

Black Lightning Riddle Pond Road, W. Topsham VT 05086; 800-252-2599

Cartridge Care of Vermont 200 Main Street Winooski VT 05404; 802-655-9774

Ideal Computer Supplies PO Box 5748 Endicott NY 13760; 607-757-0025

Lasertech RR 2 Box 41 West Burke VT 05871; 802-626-9947

McAuliffe Inc. PO Box 848 Burlington VT 05402; 800-642-5131

Ribbon Recyclers PO Box 472 Bethel VT 05032; 800-584-7244

Ribbon Recyclers 28 Commerce Street, Unit 3, PO Box 878 Williston VT 05495; 802-660-8960

Vermont Toner Recharge 266 Pine Street Burlington VT 05401; 802-864-7637

7. Packaging Peanuts:

Packaging peanuts can be reused by many businesses in Vermont. Contact your Solid Waste Management District for local packaging peanuts reuse opportunities, or call the Plastic Loose Fill Council at 1-800-828-2214.

8. Printer Ribbon Recycling:

Gerald Hall Sales & Service PO Box 404 Hardwick VT 05843; 802-472-3361

Ideal Computer Supplies 3120 E. Main Street Endwell NY 13760; 607-757-0025

Ribbon Recyclers PO Box 12 Essex Jct VT 05453; 802-879-3027

H: OTHER RECYCLING OPPORTUNITIES

1. Antifreeze Recycling Services:

Ecoserve Inc. PO Box 190 Randolph VT 05060; 802-728-3435

JTL Ecosystems RR1 Rt. 30, Box 816B Dorset VT 05351; 802-362-2144

2. Dry Cell Batteries: (non alkaline)

Int. Metal Reclamation Co. Inc. PO Box 720 Ellwood City PA; 412-758-5515

Mercury Refining Co., Inc. 790 Watervliet-Shaker Rd Latham NY 12110; 800-833-2505

Rechargeable Battery Recycling Corp.; 800-8-BATTERY

3. Freon Recovery - Certified Operators:

Call the Ozone Protection Hotline 800-296-1996. The hotline can supply a list of technician certification programs that are approved by EPA. Operators must have been trained through an approved program before they can remove freon from waste appliances.

4. Scrap Metal Dealers:

ABC Appliance & Metals Recycling/Rhodes 15 Shirely Avenue Milton VT 05468; 800-499-7089

All Metal Recycling, PO Box 1028, Morrisville, VT 05661; 1-800-416-8054

Bolduc Auto Salvage RFD 3, Box 2460 Montpelier VT 05602; 802-223-7917

Brandon Scrap Metal RD 2, Route 7 Leicester VT 05733; 802-247-8800

Brattleboro Salvage 160 Vernon Road Brattleboro VT 05301; 802-254-5388

Brown Auto Salvage Box 275 Bomoseen VT 05732; 802-468-5757

Capitol Bag & Waste Port of Albany Albany NY 12202; 518-465-4914

Clarence Brown Inc Federal Street St. Albans VT 05478; 802-524-2400

Flynn Avenue Scrap Metal Recycling Milton VT 05468; 802-893-1549

Gates Salvage Craftsbury Road Hardwick VT 05843; 802-472-5794

George Apkin & Sons, Inc 80 State Street North Adams MA 01247; 413-664-4936

Hardwick Recycling P.O. Box 138 Morrisville VT 05661; 800-639-3083

Hodgdon Brothers White River Jct. 05001; 802-295-5740

Hodgdon Brothers P.O. Box 136 Ascutney VT 05030; 802-674-6202

Hodgdon Brothers Ely Street St. Johnsbury VT 05819; 802-748-5422

Hodgdon Salvage PO Box 19 Swanton VT 05488; 802-868-7280

Janci Metal Recycling PO Box 117 West Lebanon NH 03784; 603-298-5953

Jewell Resources, Inc 260 B. Meriden Rd. Lebanon NH 03766; 800-458-4525

La Roche Inc. Route 14 South Barre VT 05670; 802-479-0269

MAC Equipment & Steel Co 286 North Main Street Rutland VT 05701; 802-773-2911

Madbury Metals Co PO Box 40 Dover NH 03820; 603-749-3314

Pickett's Metal Recycling Center Ferrisburgh VT 05456; 802-425-2369

Queen City Iron & Metal Intervale Road Burlington VT 05402; 802-864-0326

R. Brown & Sons 31 Pointers Point Rd Colchester VT 05446; 802-658-1378

Rathe Brothers Rathe Road Colchester VT 05446; 802-655-0651

Recycled Auto Parts of Brattleboro RR 6, Box 32 Brattleboro VT 05301; 800-654-9034

Rutland Waste & Metals 246 West Street Rutland VT 05701; 802-773-2877

Vermont Metal Exchange Route 2A Colchester VT 05446; 800-479-1813

WTE Recycling Inc. 75 Southern Ave. Greenfield MA; 413-772-2200

I: DIRECTORIES (comprehensive material-specific recycling market directories)

1. All Recyclable Materials:

American Recycling Market Directory/Reference Manual American Recycling Market Inc. PO Box 577, Ogdensburg NY 13669 1-800-267-0707

2. Plastics:

1995 Post-consumer Plastics Handlers and Reclaimers
American Plastics Council
1275 K Street NW, Suite 400
Washington DC 20005; 1-800-2HELP-90

Post-Consumer PET Plastic Market List NAPCOR 3770 Nations Bank Corporate Center 100 North Tryon Street, Charlotte NC 82802 704-358-8882

A Guide to Vinyl Recycling in the U.S. and Canada The Vinyl Institute One Cascade Plaza, 19th Floor, Akron OH 44308 1-800-969-8469

3. Paper:

PaperMatcher
American Paper Institute, Inc
1250 Connecticut Ave, NW, Suite 360
Washington DC 20036
1-800-878-8878

J: CLOSING THE LOOP - BUYING RECYCLED PRODUCTS

1. Vermont-specific:

Closing the Loop: A Guide to Recycled Products and Services.
Cost: \$5.00
Association of Vermont Recyclers
P.O. Box 1244, Montpelier, VT 05601
(802) 229-1833

2. Office Supplies:

Buy Recycled - The Business and Govt. Buyers Guide to Recycled Products
Cost: \$24.95
Californians Against Waste Foundation
926 J St, Suite 606, Sacramento CA 95814
(916) 443-8317

Guide to Recycled Printing & Office Paper with Post-consumer Content
Cost: \$2.00
Californians Against Waste Foundation
926 J St, Suite 606, Sacramento CA 95814
(916) 443-8317

BUY RECYCLED - Your practical Guide to the Environmentally Responsible Office
Cost: \$7.95
Services Marketing Group
8 South Michigan Ave., Suite 2500
Chicago IL 60603
(312) 332-0688

Recycled Products Guide
Cost: \$195
American Recycling Market, Inc.
P.O. Box 577. Ogdensburg, NY 13669
1-800-267-0707

3. Consumer Directories:

Shopper's Guide to Recycled Products
Cost: \$2.00
Californians Against Waste Foundation
926 J St, Suite 606, Sacramento CA 95814
1-800-2HELP-90

K: INFORMATION ON RECYCLING AND REUSE: State and National Organizations

ALUMINUM

Aluminum Recycling Association 1000 16th Street, NW, Suite 603 Washington, DC 20036 202-785-0951 Fax: 202-785-0210

GLASS

Glass Packaging Institute 1627 K Street, NW, Suite 800 Washington, DC 20006 202-887-4850

METALS

Institute of Scrap Recycling Industries 1627 K Street, NW, Suite 700 Washington, DC 20006 202-466-4050

Steel Recycling Institute 680 Andersen Drive Pittsburgh, PA 15220 1-800-876-SCRI

PAPER/PAPER PACKAGING

American Forest & Paper Association 1250 Connecticut Ave, NW, Suite 201 Washington, DC 20036 800-878-8878 Fax: 202-463-2785

Corrugated Packaging Council Rolling Meadows, IL 1-800-879-9777

Paperboard Packaging Council 1101 Vermont Ave, NW, Suite 411 Washington, DC 20005 202-289-4100 Fax: 202-289-4243

PLASTICS

American Plastics Council 1275 K Street, NW, Suite 400 Washington, DC 20005 1-800-2-HELP-90

Plastic Loose Fill Council 1-800-828-2214 (hotline lists local locations for where to bring used polystyrene packaging peanuts)

National Association for Plastic Container Recovery (PETE Plastic) 100 N. Tryon Street, Suite 3770 Charlotte, NC 28202 704-358-8882 Fax: 704-358-8769

Polystyrene Packaging Council 1025 Connecticut Avenue, NW Washington, DC 20036 202-822-6424 Fax: 202-331-0538

Plastic Bag Association 335 Lexington Ave. New York, NY 10017-6603 (212) 661-4261

Plastic Bag Information Clearinghouse (provides listings for plastic bag collection sites)
1-800-438-5856



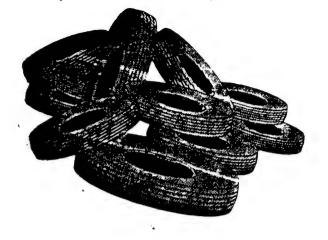
TIRES

National Tire Dealers & Retreaders Association 12501 Street, NW, Suite 400 Washington, DC 20005 202-789-2300 Fax: 202-682-3999

Tire Retread Information Bureau 900 Weldon Grove Pacific Grove, CA 93950 408-372-1917

Fax: 408-372-9210

Scrap Tire Management Council 1400 K Street, NW, Suite 900 Washington, DC 20005 202-408-7781



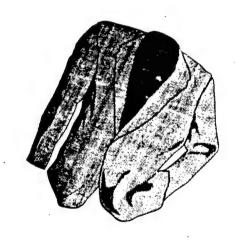
TEXTILES

Council for Textile Recycling 7910 Woodmont Ave., Suite 1212 Bethesda, MD 20814 301-718-0671

Textile Fibers & By-Products Assoc. PO Box 553026 Atlanta, GA 30355 404-262-2477

OTHER

Filter Manufacturer's Council
Hotline has a list of companies that provide filter
management services
1-800-99-FILTER



L: ORGANIZATIONS FOCUSING ON RECYCLING AND RELATED AREAS

1. Vermont and New England Organizations:

Association of Vermont Recyclers

Barry Lampke PO Box 1244 Montpelier, VT 05601 802-229-1833

AVR provides information and assistance to individuals, businesses, and institutions to help vermonters develop recycling, reduction and reuse programs. AVR publishes curriculum guides and performs interactive assembly programs on pollution prevention, recycling and composting.

Northeast Resource Recovery Assoc., (NRRA)

E. Dana Draper
Box 721
Concord, NH 03302-0721
(603) 224-6996
NPRA is a pop-profit membersh

NRRA is a non-profit membership organization offering member municipalities access to cooperative marketing programs covering the full range of municipal recyclables; also offers cooperative purchasing programs and provides technical support for all cooperative activities.

Business Recycling Corporation

E. Dana Draper
Box 721
Concord, NH 03302-0721
(603) 224-6996
The Business Recycling Corporation offers
recyclable materials marketing, transportation and
consulting services to businesses, business
cooperatives and institutions.

2. National Organizations:

Environmental Action Foundation 6930 Carroll Ave. Suite 600 Takoma Park, MD 20912 301-891-1109

Environmental Defense Fund 257 Park Avenue South New York NY 10010 212-505-2100 National Recycling Coalition 1101 30th Street, N.W. Suite 305 Washington, DC 20036 202-659-4613 Fax: 202-775-5917

National Solid Waste Management Association 1730 Rhode Island Drive, N.W, Suite 1000 Washington, DC 20036 202-659-4613 Fax: 202-775-5917

Institute for Local Self Reliance

Conducts research and provides technical assistance to communities on recycling economic development
Publications available on economic benefits of recycling
2425 18th Street NW
Washington D.C. 20009
202-232-4108

US Environmental Protection Agency Office of Solid Waste 401 M St. SW Washington DC 20460 1-800-424-9346

M: VERMONT RECYCLING COORDINATORS LIST: (area code 802)

(Contact recycling coordinators for the most local recycling options in your area.)

Porter Knight, Recycling Coordinator Addison County Solid Waste District PO Box 573, RT 7 South Middlebury VT 05753-9707 388-2333, FAX 388-0037 1-800-315-2333

Nate Williams
Bennington Regional Planning Commission
Box 342
Arlington VT 05250-0342
375-9964, FAX 375-9964

Cindy Burton, Recycling Operations Coord.
Burlington Public Works
33 Kilburne Street
Burlington VT 05401-5264
865-7262 864-7653 (fax)

Deb Fyffe, Recycling Coordinator Central Vermont Solid Waste District 260 North Main Street Barre VT 05641 479-4363, FAX 479-4339 1-800-730-9475

Nancy Plunkett & Wendy McArdle Chittenden Solid Waste District 209 Redmond Road Williston VT 05495-9133 872-8100/8111, FAX 878-5787

Sami Izzo, Recycling Ed. Coordinator Greater Upper Valley Solid Waste District Colton Center Office Park 221 South US RT 5, #2 Norwich VT 05055-9432 649-2610, FAX 649-2913

Teri White, Manager Lamoille Regional Solid Waste District RR #1, Box 2264 Morrisville VT 05661-9788 888-7317, FAX 888-650

NH/VT Solid Waste Program Room 218 Moody Building Claremont NH 03743 (603) 543-1201 Irene Sawyer, Recycling Coordinator Northeast Kingdom Waste Mgmt District RR #1, Box 376 Lyndonville VT 05851-9749 626-3532/3563 or 800-734-4602

Kathyrn Duffy, Recycling Coordinator Northwest VT Solid Waste District PO Box 1547 St Albans VT 05819-1006 524-5986 1-800-639-7053

Rutland Non-district Towns
Pam Clapp
J.M.S.C.\S.W.A.C.
376 Daisy Hollow Road
Middleton Springs, VT 05757-4134
235-2710

Deane Wilson, Recycling Coordinator Rutland County Solid Waste District 2 Green Hill Lane Rutland VT 05701-3804 775-7208/7209 or 773-4083, FAX 773-5796

Hallie Whitcomb, Recycling Coord. 607 Highland Rd. Springfield VT 05156-8844 home: 885-3376 FAX 886-2200

Jane Southworth
Windham Solid Waste District
327 Old Ferry Road
Brattleboro VT 05301-9175
257-0272



APPENDIX F

MANAGEMENT OF OZONE-DEPLETING SUBSTANCES



REPLY TO ATTENTION OF:

2 2 MAY 1994:

CECW-OA

MEMORANDUM FOR COMMANDERS, MAJOR SUBORDINATE COMMANDS

SUBJECT: U.S. Army Corps of Engineers (USACE) Operated Facilities Environmental Compliance Guidance Letter No. 6, Managing Ozone-Depleting Substances (ODSs) at USACE Projects and Facilities

- 1. <u>Purpose</u>. This guidance letter provides interim guidance for managing ODSs at USACE projects and facilities until ER 200-2-3 <u>Environmental Compliance</u> and EP 200-2-3 <u>Environmental Compliance</u> are published.
- 2. Applicability. This guidance applies to all Headquarters, USACE elements, major subordinate commands (MSCs), district commands, engineering laboratories and field operating activities (FOA) having responsibilities for Civil Works funded activities, including floating plant. USACE research and development laboratories and other facilities that are wholly or substantially military funded but not located on military installations shall adapt the ozone-depleting substance guidance in "Strategic Guidance and Planning for Eliminating Ozone-Depleting Chemicals from U.S. Army Applications" [reference (b)], in coordination with CECW-OA. USACE facilities located on Army installations will comply with the installation commanders' ozone-depleting substance elimination program requirements.

3. References.

- (a) Executive Order 12843, 21 April, 1993
- (b) Strategic Guidance and Planning for Eliminating Crone-Depleting Chemicals from U.S. Army Applications, U.S. Army Acquisition Pollution Prevention Support Office (AAPPSO), Verdonic, Daniel P. and Thomas A. Bush, October, 1995
 - (c) Clean Air Act Amendments, 42 U.S.C. § 7671 et sec.
 - (d) 40 C.F.R. Part 82 (Protection of Stratospheric Ozone)

4. Policy.

- (a) It is the policy of USACE, in conformance with Executive Order (EO) 12843, to:
 - (i) implement cost-effective programs to minimize the

SUBJECT: USACE Operated Facilities Environmental Compliance Guidance Letter No. 6, Managing ODSs at USACE Projects and Facilities

procurement of materials and substances that contribute to the depletion of stratospheric ozone; and

- (ii) give preference to the procurement of alternative chemicals, products, and manufacturing processes that reduce overall risks to human health and the environment by lessening depletion of ozone in the upper atmosphere.
- (b) In implementing this policy, procurement practices shall conform to the general requirements of Title VI of the Clean Air Act Amendments by:
- (i) minimizing, where economically feasible, the procurement of products containing, or manufactured with, Class I substances in accordance with EPAs phaseout schedule and maximizing the use of safe alternatives;
- (ii) amending existing contracts to the extent permitted by law and, where practical, to be consistent with the phaseout schedules for Class I substances;
- (iii) being aware of the phaseout schedule for Class II substances (Clean Air Act Amendments, Section 605) in developing procurement policies and in awarding contracts; and
- (iv) implementing policies and practices that recognize the increasingly limited availability of Class I substances as production levels capped by the Montreal Protocol decline until final phaseout. Such practices shall include, but not be limited to:
- o reducing emissions and recycling ozone-reducing substances;
- o ceasing the purchase of non-essential products containing or manufactured with ozone-depleting substances; and
- o requiring that new contracts provide that any acquired products containing, or manufactured with, Class I or Class II substances be labeled in accordance with section 611 of the Clean Air Act Amendments.
- (c) USACE projects and facilities shall establish, fund and implement management programs to support this policy. MSC commanders, district commanders and commanders/directors of facilities outside the district structure shall develop internal procedures to assure compliance with all aspects of this policy.

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ODS Elimination Plans shall be prepared for all projects and facilities where USACE has operations and maintenance responsifor facility needs, including government-owned, contractor-operated facilities. Production phase-out milestones are contained in the Clean Air Act Amendments and are listed in the Army Acquisition Pollution Prevention Support Office publication "Strategic Plan for Eliminating Ozone-Depleting Chemicals from U.S. Army Applications." See reference 3.(b).

5. Definitions.

- (a) Ozone-Depleting Substances means the substances controlled internationally under the Montreal Protocol and nationally under Title VI of the Clean Air Act Amendments. This includes both Class I and Class II substances.
- (b) Class I substance means any substance designated as Class I in the Federal Register notice of 30 July 1992 (see Appendix B), including chlorofluorocarbons, halons, carbon tetrachloride, and methyl chloroform and any other substance so designated by the Environmental Protection Agency (EPA) by regulation.
- (c) Class II substance means any substance designated as Class II in the Federal Register notice of 30 July 1992 (see Appendix B), including hydrochlorofluorocarbons and any other substances so designated by EPA by regulation.

6. Program Requirements.

- (a) Identify sources of ODSs and determine type and amount.
- (b) Monitor regulated ODSs to comply with standards.
- (c) Procure equipment that meets applicable standards.
- (d) Cooperate with Federal, state, and local authorities in achieving ODS plan goals.
- (e) Assure that all technicians who service appliances and industrial process refrigeration units containing ODSs are certified by an EPA approved program in accordance with 1990 Clean Air Act Amendments, Title VI, Section 602(a). See reference 3.(c).
- (f) USACE organizations in GSA leased facilities and USACE users of GSA leased vehicles will support applicable GSA programs to eliminate ODS use in accordance with lease agreements.

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(g) Annually, commanders/directors must document their ODS elimination requirements. Documentation must reflect total or "real" cost to the facility plus justification for continuing resources to accomplish projects aimed specifically at eliminating ODS applications.

7. Guidance.

- (a) Executive Order 12843 established a policy of the Federal government to implement cost-effective programs to minimize procurement of materials and substances that contribute to depletion of stratospheric ozone and give preference to procurement of alternative chemicals, products and manufacturing processes that reduce overall risks to human health and the environment by lessening depletion of ozone in the upper atmosphere.
- (b) The Army's objective is to end dependence on ODS use in equipment and processes so that the pending phaseout of Class I ODSs causes minimal impact on Army missions. Although the Class I phaseout applies to chemical production and import only, and does not apply to their use, EO 12843 and Army policy do. Class I Substances list can be found in 40 C.F.R. Part 82, Appendix A.
- (c) The key to efficiently eliminating ODSs from USACE projects and facilities is developing and implementing comprehensive ODS elimination plans. Operational project managers or facility managers should develop and execute ODS elimination plans addressing applicable facilities and equipment. Advance planning for phaseout of ODSs will minimize impact on individual projects and facilities. The Appendix describes steps involved in ODS elimination planning.
- 8. Yearly Updates. Operational project managers and facility managers should update their ODS elimination plans in advance of each annual budget cycle to reflect projected costs, plus justification for necessary resources, and provide input to the budget process. ODS coordinators should prepare updated versions of the ODS elimination plan when yearly updates are made. The updated yearly plan should reflect both accomplishments made against planned goals and unfinished requirements for eliminating ODSs.

9. Resourcing ODS Flimination.

(a) There is no special funding for CDS elimination. ODS elimination requirements shall be included in the applicable

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budgeting process. Using methodology described in this guidance, project and facility plans can be developed to totally eliminate the use of Class I ODSs.

- (b) Funding these requirements could have varying degrees of impact on constrained budgets. To determine the extent of impact, MSCs should compile costs, by district, including laboratories and FOAs, to eliminate Class I ODSs. The estimated cost for each budget year, by projects and facilities, starting with the budget cycle for FY 1999 and continuing through FY 2003, should be provided. This information needs to be compiled and forwarded to CECW-OA by 30 September 1996.
- (c) 40 C.F.R. Part 82, Appendix A (List of Ozone Depleting Chemicals)
 - (d) 48 C.F.R. Part 23 (Ozone Depleting Substances)

10. <u>Dissemination</u>. Please use your Environmental Compliance Coordinator network to give this Guidance Letter as wide a distribution as possible.

Acting Director of Civil Works

SUBJECT: USACE Operated Facilities Environmental Compliance Guidance Letter No. 6, Managing ODSs at USACE Projects and Facilities

Appendixes:

- A. Steps in ODS Elimination Planning
 B. Controlled Substances

APPENDIX A STEPS IN ODS ELIMINATION PLANNING

1. Step 1: Assign an ODS Elimination Coordinator

- (a) It is recommended that MSC Commanders and District Commanders designate an ODS coordinator in the Operations element since most of the affected facilities and equipment are at operating projects. Laboratories and FOAs should also designate ODS coordinators. The intent is to provide senior leadership with a responsible individual to monitor execution of ODS elimination efforts throughout the division, district, laboratory, FOA, etc.
- (b) ODS coordinators should be knowledgeable of USACE policies, and Federal, state and local regulations concerning ODSs, and be familiar with operations and maintenance of projects and facilities, especially those having refrigeration, air conditioning and fire suppression systems. ODS coordinators should be familiar with planning, programming and budgeting processes.
- (c) It is further recommended that operational project managers and facility managers appoint an individual to oversee and coordinate ODS elimination efforts.

2. Step 2: Inventory ODS Equipment and Supplies

- (a) The first task is to assemble an accurate inventory of all equipment which uses ODSs and an inventory of all ODS supplies on hand. The equipment inventory should include air conditioning, refrigeration, fire fighting systems, and all other ODS applications. These inventories will serve as the baseline for ODS elimination planning. The following information should be gathered as part of the equipment inventory process:
 - (i) Location of equipment area, building, and room;
- (ii) Ownership determine if equipment is project, PRIP, logistics or personal property;
- iii) Equipment type manufacturer, model, and serial
 number of affected components;
- (iv) Chemical used identify the ODS used and amount of chemical contained in the system;
- (v) Operating record include the date of installation and operating conditions of the system which apply primarily to

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APPENDIX A: STEPS IN ODS ELIMINATION PLANNING

air conditioning and refrigeration units;

- (vi) Maintenance record include scheduled maintenance actions, emergency repairs, leaks, major overhauls and chemical recharges. The history of chemical requisition may be useful to supplement maintenance records; and
- (vii) Future Plans upcoming scheduled maintenance, building renovation, demolition plans or facility realignment.
- (b) The information collected should include project and facility supplies and at least the following information:
- (i) Chemical type chemical name, new or recycled product(for quality control);
 - (ii) Storage location building and ownership;
 - (iii) Allocation specific-use dedicated chemical, and
- (iv) Amount total chemicals at that location, volume, weight, number of containers.
- (c) Equipment and chemical stock inventories should be prepared in a format that can be updated over course of the ODS elimination program. Inventories will require periodic updating.

Step 3: Conservation Measures

- (a) The next phase of ODS elimination planning is establishing maintenance processes for conserving and recovering ODS substances. Conservation measures, such as leak prevention, will be a main priority of on-going maintenance. By preventing leaks, the project or facility will have to procure fewer ODSs to replenish systems and will have a larger recoverable supply for reuse. For refrigeration and fire fighting systems, periodic checks using specialized chlorine detectors may be preferable. For air conditioning systems, especially those in detached mechanical rooms, fixed detectors may provide better protection against leaks. Fixed fire suppression systems can be checked by monitoring cylinder pressure gauges. If leakage occurs, systems must be repaired immediately. Without detection systems, leakage might progress to the point of reduced operating efficiency.
- (b) Another conservation measure that can be implemented is the installation of high efficiency purge units on centrifugal air conditioning systems. The high efficiency purges prevent the venting of CFCs during normal operation. These purges are a low

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APPENDIX A: STEPS IN ODS ELIMINATION PLANNING

cost method to conserve refrigerant and may be considered for equipment not immediately scheduled for retrofit or replacement.

4. Step 4: ODS Recovery and Reuse

- (a) After establishing accurate inventories, the operation al Project Manager or facility manager should then do an analysis or evaluation of each ODS application. Based on these evaluations, decisions can be made regarding how to deal with each ODS being used. The following paragraphs describe principal options.
- (b) Halons installed in power distribution systems, computer facilities and other electronic systems should be recovered. CFCs should also be recovered from project or facility systems when retrofit or replacement occurs. CFCs recovered from projects or facilities may be reused at the same project or facility. CFCs should also be recovered, reclaimed and reused if the project or facility determines the expense of recovery and reclaiming equipment to be worthwhile as an interim alternative to disposing used ODS solvents.

5. Step 5: Building the Elimination Plan

- (a) With the information gathered from steps 1 through 4, Operational Project Managers or facility managers can build ODS elimination plans. The schedule for retrofitting or replacing equipment should be based on a priority assessment which is discussed in the following paragraphs.
- (b) Retrofit refers to the modification of existing equipment so it can operate effectively with an alternative chemical. Recovery of the Class I ODS chemical and recharging the system with the replacement chemical is only part of the retrofit action. Frequently, additional system components should be replaced during retrofit actions. For example, fire fighting system nozzles and air conditioner lubricants should be compatible with the new chemicals used. The complexity and cost of these modifications should be evaluated when deciding between retrofit and replacement options.
- (c) Replacement is the complete removal of an existing ODS dependent system and installation of a new system that uses an environmentally acceptable alternative chemical. In some cases, ODS containing equipment may no longer be needed and can be eliminated using approved disposal procedures. Only hermetically sealed ODS systems, such as water coolers and refrigerators, which require no ODS additions during maintainance, will be allowed to continue operating indefinately and eventually be

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replaced through normal attrition and eliminated using approved disposal procedures.

- (d) Decisions on whether to retrofit or replace hardware will be based on factors such as cost, condition, age, performance, and safety. Based on the information gathered during the inventory, the project or facility manager can determine which systems are in need of immediate attention, and which will be efficient and useful for a longer period. Those systems judged to be high priority for major maintenance should be retrofitted or replaced before those systems which are operating well. Listed below are some factors to consider when prioritizing and scheduling retrofits and replacements.
 - (i) High Priority System Indicators:
 - Frequent recharges, leaking components;
 - Obsolete, inefficient equipment; 0
 - Equipment near end of life in hours use or age; 0
 - Frequent maintenance and repair required; and
 - Building modernization scheduled.
 - (ii) Low priority system indicators:
 - Recent Installation; 0
 - Low maintenance, infrequent repair required; 0
 - CFC-13 refrigerant (no option available); and
 - System resistant to retrofit. 0
 - 6. Step 6: Resourcing the Elimination Plan
 - See No. 9, Resourcing ODS Elimination, (a) and (b) of the Memorandum.
 - Step 7: Reporting Progress of the Elimination Plan
 - See No. 8, Yearly Updates, of the Memorandum.

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